

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION 5



929220

IN THE MATTER OF:

CHEMICAL RECOVERY SYSTEMS, INC.

SUPERFUND SITE

142 LOCUST STREET

ELYRIA, OHIO 44035

- - - - -

Deposition of DOROTHY OBITTS,
called for examination under the Applicable
Rules of Federal Civil Procedure, taken before
me, Claudine Kelly, a Registered Professional
Reporter and Notary Public in and for the State
of Ohio, pursuant to notice and stipulations of
counsel, at the Elyria City Hall, Council
Chambers, Elyria, Ohio, on Tuesday, December 7,
2004, at 10:05 a.m.

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3 USEPA Region 5, by

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3 Robert R. Kovalak, ICI Paints

4 Darin Duvena

5 -----

I N D E X

EXAMINATION OF DOROTHY 7 5
BOBITTS
BY MR. KAISER

AFTERNOON-SESSION 96 1

1 DOROTHY OBITTS, of lawful age, called for
2 examination, as provided by the Federal Rules
3 of Civil Procedure, being by me first duly
4 sworn, as hereinafter certified, deposed and
5 said as follows:

6 EXAMINATION OF DOROTHY OBITTS

7 BY MR. KAISER:

8 Q. Good morning, Mrs. Obitts.

9 A. Good morning.

10 Q. I want to thank you for coming and
11 participating in this deposition this morning.
12 For the court reporter's benefit, could you
13 please spell your first name and your last
14 name?

15 A. Dorothy. D O R O T H Y. Obitts.
16 O B I T T S.

17 Q. Thank you, Mrs. Obitts. And where
18 do you currently live?

19 A. [REDACTED]

20 Q. How long have you lived there?

21 A. About 45 to 50 years.

22 Q. All right. In the deposition over
23 the course of the morning and the afternoon
24 I'll be asking you questions on behalf of the
25 United States Environmental Protection Agency.

10:08:04

10:08:16

10:08:32

10:08:46

1 And time permitting one or more of these
2 gentlemen may ask you questions either later
3 this afternoon or perhaps tomorrow or at
4 another date that we schedule where they would
5 come back and ask you questions. Is that okay?

10:09:01

6 A. I understand that. Yes.

7 Q. I want to begin by showing you a
8 couple of documents just to make clear why
9 we're here and how we're all in this room. I'm
10 showing you what I'm marking for purposes of
11 identification, currently has a stamp on it
12 Plaintiff's Number 2, that will be changed to
13 USEPA Exhibit Number 2 by the end of the day.

10:09:13

14 But right now it says Plaintiff's
15 Number 2. I'm going to try to at least put the
16 front cover of that up on the screen.

10:09:30

17 Do you recognize this letter, Mrs.
18 Obitts?

19 A. Yes, I do.

20 Q. What do you recognize it to be?

10:09:47

21 A. It's a notice to advise me that
22 there would be a deposition scheduled today and
23 that I am supposed to attend it.

24 Q. And did I hand you a copy of that
25 deposition at your home yesterday afternoon?

10:10:04

1 A. Yes.

2 MR. KAISER: I apologize,
3 gentlemen, I have a limited number of copies.
4 To the extent I can, I'll try to put things on
5 the overhead so that you can see this. What 10:10:15
6 I'm showing Mrs. Obitts at this point is simply
7 the Notice of Administrative Deposition marked
8 for purposes of identification as USEPA's
9 Exhibit Number 2.

10 Q. In addition to that notice of 10:10:29
11 deposition, Mrs. Obitts, did I also show you
12 yesterday what I've marked for purposes of
13 identification as Exhibit Number 3, an Amended
14 Notice of Deposition?

15 A. Yes, you did. 10:10:41

16 Q. Did I also give you that yesterday
17 afternoon?

18 A. Yes, you did.

19 Q. And that indicates that we're here
20 pursuant to certain authorities vested in the 10:11:00
21 United States Environmental Protection Agency,
22 does it not?

23 A. Yes, it does.

24 Q. If you could just tell the
25 gentlemen here this morning a little bit about 10:11:15

1 your background, where were you born?

2 A. I was born in Martinsburg, West
3 Virginia. My parents moved to Elyria when I
4 was about two years old. So I have no
5 recollection of living there and I've lived in
6 Elyria ever since. 10:11:28

7 Q. What is your current age, Mrs.
8 Obitts?

9 A. I'm 79.

10 Q. What was your educational
11 background? 10:11:36

12 A. I completed high school.

13 Q. Can you tell us a little bit about
14 your job experiences?

15 A. There was at one time my mother and
16 I owned a night club. That was way back in the
17 late 40s. It was called Candlelight and it was
18 in North Ridgeville. And I worked there as
19 soon as we owned that. And then most recent I
20 worked at American Ship Building when I was
21 young also. 10:11:44

22 Q. How was it you started work at
23 Obitts Chemical Company? 10:12:06

24 A. I met Mr. Obitts at a party, I was
25 there with a friend, and that's where I first 10:12:20

1 met him. And at that time he asked me if I'd
2 be interested in helping him clean out his
3 office, because he had an office girl who had
4 made a lot of mistakes there.

5 Q. Can you help us by giving us a time 10:12:36
6 frame. Do you recall roughly when you had that
7 conversation with Mr. Obitts?

8 A. It was in the early '60s, about
9 '62.

10 Q. And after having that conversation 10:12:46
11 did you in fact go to work for Mr. Obitts?

12 A. Yes, I did.

13 Q. Where was it that you went to work?

14 A. On Locust Street where we are
15 talking about, the same property, right now. 10:12:58

16 Q. All right. And we will be talking
17 about that property throughout the course of
18 the morning and during the afternoon and that
19 property we may call it the site --

20 A. Yes. 10:13:12

21 Q. -- or the facility. And when we
22 use those terms, the site or facility, up on
23 the screen here you see a hand drawn diagram.
24 Do you recognize that diagram?

25 A. Yes. It's a diagram of the site 10:13:26

1 we're speaking of.

2 Q. Do you know who drew that diagram?

3 A. My son Dennis drew that.

4 Q. Does that roughly show us the area
5 that we're calling the site or the facility
6 also known as Obitts Chemical or Chemical
7 Services?

10:13:39

8 A. Yes, it does.

9 Q. I see at the bottom of that drawing
10 the first word is Harshaw, do you know what
11 that refers to?

10:13:49

12 A. Harshaw is located right across the
13 street from this site.

14 Q. And that's Harshaw Chemical?

15 A. Yes. It's now Englehardt.

10:14:01

16 Q. Now Englehardt?

17 A. Uh-huh.

18 Q. I see Locust Street, that's the
19 southern boundary of your property. Just to
20 try to get an orientation the Black River at
21 that point, as I understand, loops around your
22 property, does it not?

10:14:11

23 A. Yes, it does.

24 Q. Is it fair to say Locust Street is
25 on the south end of your property?

10:14:22

1 A. I'm trying to get my directions
2 correct. Yes. I would say so.

3 Q. And these other buildings then on
4 the far left, it says old -- can you read that?

5 A. Old Jones Motor Freight building. 10:14:38

6 Q. Was that part of your site and your
7 property? And when I say your property I'm
8 referring to Obitts Chemical?

9 A. It was not originally. But I
10 bought it at one time later. 10:14:49

11 Q. All right. As we move through the
12 time frame you'll fill that in for us?

13 A. Yes, I will.

14 Q. Chemical Services, with the boys
15 room and lunchroom in the lower right-hand 10:14:59
16 corner, what building is that or was that?

17 A. That was the building next to the
18 office. It was a building that the boys had
19 locker rooms, lunch tables and so forth, places
20 to change their clothes and shower. And the 10:15:15
21 other part of that building was another
22 business called Chemical Service Corporation
23 where we did a different process than we did in
24 the Obitts Chemical Company building.

25 Q. And when you say "we" you and your 10:15:35

1 husband, Mr. Obitts?

2 A. Yes.

3 Q. What was your husband's first name?

4 A. Russell.

5 Q. When did Mr. Obitts pass away?

10:15:41

6 A. 1991 in August.

7 Q. 1991?

8 A. Uh-huh.

9 Q. And at some point you became vice
10 president and treasurer of the companies?

10:15:53

11 A. Yes.

12 Q. With your husband?

13 A. Yes.

14 Q. And you also owned stock in those
15 companies?

10:15:59

16 A. Yes, I did.

17 Q. We'll go into that in more detail
18 again. Just to get the lay of the land then,
19 in the center of the diagram there is something
20 called house office building. Can you tell us
21 what activities occurred in that building?

10:16:08

22 A. That was an older home that was
23 converted into an office. The front part of
24 the building was an office, the back part was
25 the laboratory. And Mr. Obitts tested the

10:16:24

1 chemicals that we processed in our plant in the
2 lab.

3 Q. Are you familiar with your late
4 husband's training as a chemist?

5 A. He attended three different
6 colleges, Baldwin-Wallace, University of
7 Michigan and one other one. Which I can't
8 think of right now.

10:16:39

9 Q. If it comes back to you.

10 A. All right.

10:16:54

11 Q. Let us know. Then I see another
12 square with the words block building, trucks
13 and new drums, can you tell us what activity
14 occurred in that building?

15 A. We started our tractors in that
16 building. In the wintertime we connected them
17 to heaters so that they would be easy to start
18 in the cold weather. The rest of the building
19 was used for storage of new drums, which we
20 would put solvents in at a later time.

10:17:10

10:17:25

21 Q. And then on the top part of that
22 diagram it indicates process plant. What
23 activities occurred in that area?

24 A. That's where chemicals were
25 processed. We had stills there that did the

10:17:39

1 processing and we had tanks for storage. It
2 was a diked area.

3 Q. A diked area?

4 A. Yes.

5 Q. That is there was a curb around it
6 in case there was a spill?

10:17:52

7 A. Yes. It was concrete diked.

8 Q. So that entire area where we see
9 the storage tanks indicated in the upper right,
10 is that the area that was diked?

10:18:06

11 A. Yes.

12 Q. I see in the upper left it
13 indicates drum storage. What activities
14 occurred in that area?

15 A. In the drum storage we put
16 materials that were to be processed or also
17 empty drums that had been emptied and gone
18 through the process.

10:18:14

19 Q. Now, as I understand it, Mr. Obitts
20 after meeting you at the party asked you to
21 come and work in his office and try to put
22 things in order?

10:18:28

23 A. Yes.

24 Q. Did you do that?

25 A. Yes, I did.

10:18:35

1 Q. What condition did you find the
2 paperwork in when you arrived?

3 A. The girl who was new there and
4 didn't really know what she was doing, she had
5 piled everything on the desk. And I had to
6 sort through everything. It took me about two
7 weeks to straighten it all out.

10:18:45

8 Q. Once you straightened it out did
9 you report back to Mr. Obitts?

10 A. Yes. I stayed on there to work.

10:18:58

11 Q. He made you a offer of full-time
12 employment?

13 A. Yes, he did.

14 Q. Did you go to work for him full
15 time?

10:19:06

16 A. Yes, I did.

17 Q. Again, what was the time frame?

18 A. From when I started you mean?

19 Q. Yeah. What year was that?

20 A. That was about 1962.

10:19:12

21 Q. What were your activities when you
22 began working full time, and was it for Obitts
23 Chemical?

24 A. Yes.

25 Q. So we're now at some point in the

10:19:22

1 early '60s and your husband had, as I
2 understand it, two businesses --

3 A. Yes.

4 Q. -- on that site?

5 A. Yes.

10:19:30

6 Q. One was called Obitts Chemicals?

7 A. Yes.

8 Q. What was the other called?

9 A. Chemical Service Corporation.

10 Q. Were you involved with both
11 businesses?

10:19:38

12 A. Yes, I was.

13 Q. What were your responsibilities
14 with respect to Obitts Chemicals?

15 A. I did the bookkeeping. I took the
16 telephone calls. I scheduled the pickups of
17 solvents, dirty solvents. I scheduled the
18 delivery of clean solvents. I did payroll,
19 everything that anybody does in an office I
20 did.

10:19:46

10:20:04

21 Q. With respect to Chemical Services
22 what were your responsibilities there?

23 A. I had the same duties with Chemical
24 Service. Eventually I had to hire another girl
25 to help me.

10:20:14

1 Q. Where did you do the work for
2 Obitts Chemical?

3 A. I did the work for Obitts Chemical
4 in this office building that we just spoke
5 about and also for Chemical Service. 10:20:26

6 Q. So you did the books and the
7 paperwork for both businesses out of the same
8 office?

9 A. Yes, I did.

10 Q. Did you maintain separate books for 10:20:40
11 both businesses?

12 A. Yes, I did.

13 Q. How would you describe the basic
14 business of Obitts Chemicals?

15 A. Our basic business was reclaiming 10:20:46
16 solvents. We would pick up dirty solvents
17 from different companies and we would process
18 them through our stills and we would make the
19 material clean and we would return the material
20 back to the same person that we picked it up 10:21:06
21 from.

22 Q. What were the services offered by
23 Chemical Service?

24 A. That was a process that had a
25 different type of processing. We had a tower 10:21:19

1 there where the chemicals had to go way up in
2 the tower and come back for cleaning. And this
3 was done principally to start with for Astlett
4 Balata.

5 Q. Now that's a difficult name if
6 you're not maybe from this area. Can you
7 possibly spell the name of that company?

10:21:38

8 A. A S T L E T T. Capital B A L A T
9 A.

10 Q. Do you know what the nature of
11 their business was?

10:21:52

12 A. I'm not really sure. But I know
13 Balata is a kind of rubber you use in a golf
14 ball, so.

15 Q. So the Chemical Services had a
16 separate process for distilling chemicals that
17 had rubber residue in it, is that accurate?

10:22:04

18 A. That's true. And the material was
19 acetone.

20 Q. And that was done in a separate
21 facility within the site?

10:22:17

22 A. Yes.

23 Q. Separate stills?

24 A. Yes.

25 Q. And the Chemical Service work was

10:22:23

1 done in the building that is shown on the lower
2 left of the diagram?

3 A. That's right.

4 Q. And the processing of the chemicals
5 for Obitts Chemicals, where did that occur? 10:22:33

6 A. That occurred in the process plant
7 in the back of the property.

8 Q. Do you recall the address of Obitts
9 Chemical?

10 A. There are seven parcels of land 10:22:45
11 there. There are different addresses. There's
12 128, 126, 128, 132, 140, 141. Our office was
13 at 142 Locust Street.

14 Q. 142 Locust Street?

15 A. Yes. 10:23:07

16 Q. What city is that located?

17 A. Elyria, Ohio.

18 Q. What county?

19 A. Lorain County.

20 Q. What state? 10:23:11

21 A. Ohio.

22 Q. I'd like to show you some
23 photographs. And I'm going to try to show them
24 on the overhead monitor, but if they don't work
25 I'll put them right in front of you. 10:23:28

1 A. I can see them on here.

2 Q. What am I doing wrong here? Okay.
3 Very good.

4 So you recognize this photo?

5 A. Yes, I do.

10:23:45

6 Q. What do you recognize to be shown,
7 and I'm going to mark for purposes of
8 identification this series of black and white
9 photographs as EPA Exhibit 4, and then I'll
10 label each photograph 4A, B, C, D, E, F, G, H.

10:23:59

11 Now this first photograph, do you
12 recognize what's shown in that photograph?

13 A. Yes, I do.

14 Q. What's shown in that photograph?

15 A. That is the new still and that is
16 James Jackson who is to the right of it.

10:24:20

17 Q. Where is that still being unloaded?

18 A. At our process plant on the back of
19 the property.

20 Q. When you say our plant are you
21 talking about Obitts Chemical?

10:24:34

22 A. I'm talking about Obitts Chemical,
23 yes.

24 Q. Do you recall about what year that
25 was when that new still was delivered?

10:24:46

1 A. I don't remember what year it was.
2 It was in the later '60s, not in the early
3 '60s.

4 Q. All right. And how was it that
5 you're able to place it in the later '60s as
6 opposed to the early '60s?

10:24:57

7 A. Because I remember that it wasn't
8 there when I first went to work there. We
9 purchased that while I was working there.

10 Q. All right. And that again was
11 photograph 4A.

10:25:09

12 I'm now going to show you what's
13 going to be marked for purposes of
14 identification as EPA Exhibit 4B. Again, do
15 you recognize what's shown in this photograph?

10:25:26

16 A. Yes. That's our tow motor. And
17 one of our employees was loading a drum on one
18 of our trucks.

19 Q. Was that related to the arrival of
20 the still at all or this is just a shot of
21 workers in action?

10:25:39

22 A. This is just workers in action. It
23 happened every day or so.

24 Q. When you say it happened every day
25 or so, what activity are you referring to?

10:25:50

1 A. I'm talking about delivering clean
2 material back to a customer. And sometimes it
3 was done in drums and sometimes it was
4 delivered in tankers.

5 Q. All right. Just as a general
6 matter, and later this morning we'll go into
7 more specifics with respect to individual
8 clients. But as a general matter, when did you
9 return clean solvent to a customer in drums and
10 when did you return it to a customer in a
11 tanker?

10:26:05

10:26:18

12 A. If we picked it up in drums we
13 returned it in drums, in clean drums. And if
14 we picked it up in bulk in a dirty tanker, we
15 returned it in a clean tanker.

10:26:34

16 Q. Can you describe for the ladies and
17 gentlemen here this morning the types of trucks
18 that Obitts Chemical had and operated during
19 the period of roughly 1962 through, about 1974
20 did you complete operations at the site?

10:26:51

21 A. Yes.

22 Q. Can you tell the ladies and
23 gentlemen here what types of trucks Obitts
24 Chemical had?

25 A. We had three tractors which pulled,

10:27:00

1 we had three trucks that carry drums. We had a
2 clean tanker, dirty tanker, about 5,000 gallon
3 capacity, and we had another dirty tanker that
4 held about 4,000 gallons.

5 Q. Now, you were describing while 10:27:32
6 looking at this photograph, EPA Exhibit 4B,
7 that some of the solvents would come in in
8 drums?

9 A. Yes.

10 Q. The drums, could you describe for 10:27:37
11 us the process?

12 A. The material would be pumped out of
13 the drums into the process plant. It would be
14 cleaned or distilled and the material that was
15 clean would go into the clean drums. 10:27:52

16 And the sludge would go into a
17 tanker that was furnished to us by Robert Ross
18 & Sons. And when the tanker was full we would
19 call them and they would pick it up.

20 Q. So Robert Ross & Sons would remove 10:28:08
21 the sludge?

22 A. Yes.

23 Q. What would you, and when I say you
24 I mean Obitts Chemical, what would Obitts
25 Chemical do with the dirty drums that you had 10:28:20

1 just taken the dirty solvent out of?

2 A. The drum man would pick them up.
3 The one that brought clean drums would pick up
4 the dirty drums.

5 Q. And so you then would have a supply
6 of clean drums on site that the clean reclaimed
7 solvent would go into?

10:28:34

8 A. That's correct.

9 Q. What would be the process when you
10 would pick up solvent with the tank truck, can
11 you describe that for us?

10:28:46

12 A. When we picked up in the tanker the
13 driver would go to the plant where he was
14 picking up and the material would be pumped
15 into our dirty tanker. We would bring it back
16 to our place for process.

10:29:01

17 Q. And you had one tanker that was
18 dedicated to picking up dirty solvent?

19 A. Yes.

20 Q. And another tanker that was
21 dedicated to delivering clean recovered
22 solvent?

10:29:13

23 A. Yes.

24 Q. I want to show you a photograph
25 that will be marked as EPA Exhibit 4C. Do you

10:29:24

1 recognize what's shown in this exhibit?

2 A. Yes.

3 Q. What?

4 A. We are taking the new still off the
5 truck.

10:29:49

6 Q. So there in 4C we're back to the
7 delivery of the still in the late 1960s?

8 A. Yes.

9 Q. I see drums in the foreground. Do
10 you have any way of knowing whether those are
11 empty drums, full drums, clean drums, dirty
12 drums? Is there any way of telling by the
13 location or anything?

10:29:59

14 A. No. Except they look to me like
15 clean drums. They don't have any dirt on top
16 of them or any rust.

10:30:12

17 Q. Those look like maybe drums that
18 clean solvent would be returned to customers
19 in?

20 A. Yes.

10:30:23

21 Q. I want to show you again 4D. 4D,
22 which is now up on the screen, again, what do
23 you recognize or do you recognize what's
24 occurring in that photograph?

25 A. It looks as though they're taking

10:30:59

1 the -- I'm not sure if that's the still or not.

2 Q. All right. It's hard to see in
3 that photograph.

4 A. It's very difficult to see that.

5 Q. Again just a shot --

10:31:13

6 A. It's our tow motor and one of our
7 employees.

8 Q. I'm going to show you 4E quickly.
9 Do you recognize what's shown in that
10 photograph?

10:31:28

11 A. I think it's more of the same.
12 It's showing the still.

13 Q. Now, that building that's shown on
14 the left, do you know which building that is?

15 A. That's the process plant.

10:31:36

16 Q. And when you say process plant,
17 that was the building that was shown at the top
18 of the diagram, USEPA's Exhibit Number 1?

19 A. Yes. That's the building in the
20 back. It's a steel building.

10:31:53

21 Q. I'm showing you what's been marked
22 for purposes of identification as EPA's Exhibit
23 4F. Do you recognize what's shown in that
24 photograph?

25 A. That's one of our tractors and

10:32:14

1 tailors and that's what we would pick up drums
2 in and delivery drums in.

3 Q. Again, can you give us a time frame
4 on that photograph?

5 A. We always had tractor trailers and 10:33:03
6 vans. I don't know which one that is. We had
7 more than one.

8 Q. I'm showing you EPA's Exhibit 4G,
9 again, do you recognize what's shown in that
10 photograph? 10:33:03

11 A. Yes. That's the process plant
12 building and this is Jim Jackson, our foreman.
13 And that's the new still.

14 Q. Is Mr. Jackson the gentleman with
15 his back to us in that photograph? 10:33:03

16 A. Yes.

17 Q. How long did Mr. Jackson work for
18 Obitts Chemical?

19 A. He worked there many years. He
20 worked there before I did. And he was still 10:33:07
21 working there for Chemical Recovery after we
22 sold it to them.

23 Q. Is he still living?

24 A. No. He's deceased.

25 Q. And finally I'm going to show you 10:33:19

1 EPA's Exhibit 4H, do you recognize what's shown
2 in that photograph?

3 A. Yes, it's part of the still.

4 Q. All right. Now that series of
5 photographs, those black and white photographs 10:33:33
6 that we've marked for purposes of
7 identification as EPA's Exhibit 4A through H,
8 do all of those photographs that we've looked
9 at truly and accurately represent conditions at
10 the site on or about the time they were taken? 10:33:47

11 A. Yes, they do.

12 Q. I'd like to show you another series
13 of photographs, Mrs. Obitts. And these we're
14 going to mark each as Exhibits 5A, B, C, D, E,
15 F, G, H, I, J, K, L, M, N, O, P, Q, R, S, T, U, 10:34:35
16 V, W, X, Y, Z, double A, double B, double C,
17 double D, double E.

18 We'll work our way through these
19 and probably take a break.

20 A. Okay. 10:35:02

21 Q. I'm going to show you what I've
22 mark as Exhibit 5A right here. Just to get us
23 started, do you recognize what's in that photo?

24 A. Yes. That's the cat that hung
25 around our office building sitting on the rail 10:35:28

1 of the porch.

2 Q. Does that enable you by looking at
3 that cat, does that enable you to place the
4 time frame we're looking at here?

5 A. This was in the early '60s.

10:35:42

6 MR. KAISER: I don't have copies
7 for everyone in the room, but I'm handing out
8 some color reproductions of those photographs.
9 To the extent I can display them on the
10 overhead I will. But certain ones may be
11 difficult to review on the overhead.

10:35:56

12 Q. I'm showing you 5B, do you
13 recognize what's shown in that photograph?

14 A. It's the same cat sitting on the
15 car.

10:36:08

16 Q. 5B, a cat sitting on a car, and in
17 the background what do we see?

18 A. There's a tanker and some drums.

19 Q. Can you identify, is that tanker on
20 Obitts property?

10:36:23

21 A. It's a tank. It's a storage tank.

22 Q. One of the above ground storage
23 tanks up in that process plant area?

24 A. Now wait a minute. This is not in
25 the process plant.

10:36:37

1 If you see the wire fence, that is
2 a fence that separated our property from
3 Harshaw Chemical property. And you can see
4 there's some drums beyond that fence. That is
5 the far end of the property. It would be east.

10:36:58

6 Q. Looking through that photograph,
7 and again I'm trying to get it up on this
8 screen, but without complete success, are those
9 drums that we're looking at, are they on Obitts
10 property?

10:37:20

11 A. Yes.

12 Q. The tanker beyond that, do you know
13 whether that's on Obitts property?

14 A. That's on Obitts property. The
15 tank is.

10:37:28

16 Q. And is it your testimony that the
17 fence line though is the fence that separates
18 Obitts from --

19 A. Harshaw Chemical.

20 Q. -- Harshaw Chemical?

10:37:37

21 A. Yes.

22 Q. Again was that tank -- what was the
23 function of that tank, if you know?

24 A. That was a storage tank.

25 Q. For what types of chemicals?

10:37:47

1 A. That would be a dirty storage tank.

2 Q. All right. So dirty chemicals
3 would arrive from either the tanker truck or
4 drums and be pumped into that tank?

5 A. Yes. That's if we weren't going to 10:38:04
6 process it immediately. If we were going to
7 process it immediately it would be pumped into
8 the process plant.

9 Q. Into the process plant. How would
10 you make the decision whether to process the 10:38:15
11 materials immediately or whether to store them
12 in a tank?

13 A. Depends on how much work we had to
14 do and how fast a customer needed their order
15 back. 10:38:28

16 Q. Would people pay a premium to have
17 a quick turnaround or would --

18 A. No.

19 Q. -- would you just do that as a
20 courtesy? 10:38:37

21 A. Well, we picked it up. We
22 generally knew when they would need it back and
23 we ran it that way, we put a priority on the
24 need of our customers. There was no extra
25 charge. 10:38:50

1 Q. Just generally speaking, what was
2 the turnaround time on solvent from the time it
3 would come onto your property until the time it
4 would be returned to a customer as clean
5 product? Is there any general rule?

10:39:00

6 A. It would vary. If somebody needed
7 the material back in a hurry we could process
8 it. And we worked three shifts around the
9 clock. We could process it and send it back in
10 two days.

10:39:16

11 Q. So, get it on site day one, process
12 it, complete the processing and ship out by the
13 close of business day two?

14 A. Uh-huh.

15 Q. I'm showing you a photograph that
16 I've marked for purposes of identification as
17 5C. Do you recognize the person in that
18 photograph?

10:39:33

19 A. Yes, I do.

20 Q. Who is that?

10:39:45

21 A. That's Walter Coats and myself.

22 Q. And where are you standing?

23 A. We're standing by a tanker that is
24 an on the road tanker. Beyond that is Harshaw
25 Chemical.

10:40:05

1 Q. So that tanker truck, or that's a
2 tanker, to whom did that belong?

3 A. That belonged to Obitts Chemical
4 Company.

5 Q. Do you know whether that's the
6 tanker that was dedicated to picking up dirty
7 material?

10:40:14

8 A. Dirty materials, yes.

9 Q. That's dirty materials?

10 A. Yes.

10:40:25

11 Q. About what time frame do we have
12 there?

13 A. This is in the '60s.

14 Q. I'm going to show you a photo that
15 I've marked for purposes of identification as
16 EPA's Exhibit 5D. I'll ask you whether you
17 recognize the person shown in that photograph?

10:40:38

18 A. This is Jim Jackson, our foreman,
19 and my husband, Mr. Obitts.

20 Q. Who is the gentleman with his arm
21 raised in the photograph?

10:40:54

22 A. That's Jim Jackson.

23 Q. And your husband is the gentleman
24 on the left?

25 A. Yes, that's right.

10:41:02

1 Q. What do we see in the background
2 behind your husband to the left?

3 A. You're seeing the process plant
4 with drums of dirty material in front.

5 Q. Is this cinder? Is that a cinder
6 or brick block building to the right?

10:41:17

7 A. That's a tile building.

8 Q. A tile building?

9 A. That's where the tractors were
10 parked.

10:41:27

11 Q. And you were saying in the winter
12 especially you would plug in the tractors so
13 they'd start in the morning?

14 A. Yes.

15 Q. Are you able to place the time
16 frame of this photograph?

10:41:35

17 A. This was in the '60s. I couldn't
18 remember what year by the picture.

19 Q. Though you know, do you not, Mrs.
20 Obitts, it was sometime after 1965?

10:41:46

21 A. I know it was after '65, because
22 you could see my husband's hands. They show
23 his burns. He blew up in the plant, in the
24 Chemical Service plant 1965.

25 Q. And we'll talk about that. We have

10:42:04

1 some photographs of that event. And that's 5D.

2 5E, again, can you tell us who is
3 in that photograph?

4 A. This is Walter Coats, he was a
5 still operator. It's similar to the other
6 picture. It's our dirty tanker and it shows
7 Harshaw Chemical with drums piled up by it.

10:42:19

8 Q. And very similar to the information
9 in the other photograph we looked at. 5F, what
10 is that a photograph of?

10:42:38

11 A. That's a dirty tanker and our
12 straight truck.

13 Q. So that big tanker was what you
14 picked up dirty solvent in or one of them. And
15 when you say straight truck what do you mean by
16 that?

10:42:53

17 A. It's a truck that is not a tractor.
18 It's a one piece truck. It has a van and the
19 tractor connected. It's not one that you drive
20 the tractor away from.

10:43:05

21 Q. What functions did you perform with
22 the straight truck?

23 A. We used that for drum pickup and
24 delivery of smaller orders than the big vans.
25 This carried 32 drums.

10:43:18

1 Q. So that straight truck that we see
2 at least half of it in photograph EPA 5F, that
3 was the smaller truck that carried 32 drums?

4 A. Yes.

5 Q. 5G, do you recognize what's shown
6 in that photograph?

7 A. This is one of our tankers.

8 Q. Was that tanker, was that a clean
9 or dirty solvent tanker?

10 A. This was a clean solvent tanker.
11 And what you see in the background is our
12 pumping system to load it.

13 Q. I see. To load it. When you say
14 to load it, can you tell the ladies and
15 gentlemen here this morning what were you
16 loading with that apparatus behind the tanker?

17 A. It would be clean solvent that we
18 were returning to a customer.

19 Q. How was that -- I see those pipes
20 there. How are they connected to the
21 processing still? How did the clean solvent
22 get from the processing building to that area?

23 A. This is close to the processing
24 building. It's in the back of the plant. If
25 you see a house in the background that would be

1 across the river on Washington Avenue.

2 Q. So through that piping system the
3 clean solvent would be --

4 A. It would be piped into the tanker.

5 Q. I'm showing you what's marked for 10:45:00
6 purposes of identification as EPA's Exhibit 5H.
7 Do you recognize what's shown in that
8 photograph?

9 A. This is a clean tanker for
10 delivering clean materials. It's a stainless 10:45:10
11 steel tanker.

12 Q. Is that the same filling apparatus
13 that we saw in the --

14 A. Yes, it is.

15 Q. -- previous photo 5G? Okay. 10:45:23

16 What are those, what's to the left
17 of the truck?

18 A. Those are storage tanks.

19 Q. What was stored in those tanks?

20 A. Clean material. Clean solvents. 10:45:37

21 Q. Showing you what's marked for
22 purposes of identification as EPA's 5I, do you
23 recognize what's shown in that photograph?

24 A. Yes, this is the same tanker. It's
25 a stainless steel tanker which carried clean 10:45:56

1 material back to a customer.

2 Q. And the building right behind it
3 that you see right over the top of the tanker,
4 do you recognize that building?

5 A. That's a process building. 10:46:07

6 Q. Is that a church steeple behind the
7 process building?

8 A. Yes. That's across the river on
9 Washington Avenue.

10 Q. Photograph 5J, do you recognize 10:46:18
11 what's shown in photograph 5J?

12 A. This is also one of our tankers.
13 This is also a clean tanker which delivered
14 clean materials. And beside it is one of our
15 tractors. The building shown is Harshaw 10:46:35
16 Chemical. This is the front next to Locust
17 Street.

18 Q. When you say the building shown
19 what -- oh, I see that's Harshaw.

20 A. Harshaw. 10:46:56

21 Q. Harshaw Chemical. And that fence
22 line, does that divide your property from
23 Harshaw?

24 A. That's my fence, yes. And it's
25 next to the road. 10:47:07

1 Q. What road?

2 A. Locust Street. And that type of
3 fence encloses our property. The property is
4 completely fenced.

5 Q. I'd like to show you EPA's Exhibit
6 5K. Do you recognize what's shown in that
7 photograph?

10:47:23

8 A. Yes. These are storage tanks in
9 the process plant where you can see the piping.
10 Clean material went into those tanks.

10:47:37

11 Q. I'm showing you EPA's Exhibit 5L.
12 Do you recognize what's shown in 5L?

13 A. This is a tanker that tipped over
14 and we called the fire department and they came
15 and took care of it.

10:48:04

16 Q. Do you recognize that gentleman?

17 A. No. I don't recognize him. He had
18 to be an employee.

19 Q. Can you tell us by looking at that
20 photograph what area of your facility where
21 that spill took place?

10:48:14

22 A. It shows part of Harshaw in the
23 background. I think. Let me look here.

24 This was down near the process
25 plant. It wasn't up front. It was down near

10:48:41

1 the process plant.

2 Q. Do you know how much material was
3 in that tanker when it tipped?

4 A. I think it was 2,000 gallons.

5 Q. Do you happen to know whose 10:48:59
6 material was in the tanker?

7 A. No, I don't remember.

8 Q. Is there anyone living who might
9 know?

10 A. Not to my knowledge. 10:49:07

11 Q. I'm showing you what's been marked
12 for purposes of identification as EPA's Exhibit
13 5M. I'm asking you whether you recognize
14 what's shown in that photograph, 5M?

15 A. This is Jim Jackson's home. It was 10:49:24
16 flooded. He lives, I forget the name of the
17 street. But the background shows Harshaw
18 Chemical and the foreground shows Mr. Jackson's
19 home. He lived pretty close to the plant. He
20 had to use a boat to get to his house. 10:49:52

21 Q. I take it the river flooded?

22 A. Yes, it's the river.

23 Q. I'm showing you photograph 5N. Do
24 you recognize what's shown in photograph 5N?

25 A. This is the Chemical Service 10:50:05

1 Corporation building where we did processing.

2 Q. And that's a somewhat dark
3 photograph, isn't it?

4 A. It's not --

5 Q. It's not good contrast.

10:50:19

6 A. It's a cement block building.

7 Q. But you recognize that's a cement
8 block building?

9 A. Yes.

10 Q. Is that the building that also had
11 the boys club in it?

10:50:26

12 A. The boys room was to the right.
13 Yes. It was actually another building. But
14 the buildings were butted together, built
15 together.

10:50:39

16 Q. And that was where Chemical Service
17 did its distillation processing?

18 A. Yes.

19 Q. I'm showing you a photograph I've
20 marked for purposes of identification as EPA's
21 Exhibit 50. Do you recognize what's shown in
22 that photograph?

10:50:51

23 A. This is a truck from Advanced
24 Barrel and they are either delivering or
25 picking up drums.

10:51:06

1 Q. Advanced Barrel, what service did
2 they provide Obitts Chemical?

3 A. We purchased new drums from them.

4 Q. Did they also take away the old
5 dirty drums? 10:51:17

6 A. Yes, they did.

7 Q. I'm showing you a photograph I've
8 marked for purposes of identification as EPA's
9 Exhibit 5P. Do you recognize what's shown in
10 that photograph? 10:51:28

11 A. Well, it's showing drum storage in
12 our yard. This was in the early '60s.

13 Q. How were you able to date that
14 photograph?

15 A. By the police dog. 10:51:52

16 Q. The dog by the blue barrel in the
17 foreground?

18 A. Yes.

19 Q. Whose dog was that?

20 A. That was Mr. Obitts's dog. 10:51:59

21 Q. And that was just generally outdoor
22 drum storage?

23 A. Yes, it is.

24 Q. Do you know whether those were
25 clean or dirty drums? 10:52:07

1 A. The ones that are sitting on the
2 platform I think are clean drums. But the ones
3 in the yard are with dirty material.

4 Q. And I take it that dirty material
5 was awaiting processing?

10:52:21

6 A. Yes.

7 Q. What was the longest, I mean you
8 described that if a customer really needed the
9 material turned around quick you could turn it
10 around in two days. During the time you worked
11 there, what would be a long period of time for
12 dirty solvent to remain on site in barrels
13 before it was processed?

10:52:35

14 A. There was never ever a long period
15 of time, because even if they didn't want their
16 order back, you know, like next week, we would
17 still process it and put it in clean storage,
18 so it would be ready when they called.

10:52:49

19 Q. So, just as a business practice, it
20 was your practice and your husband's practice
21 to process the dirty solvent as quickly as
22 possible so that you were storing clean solvent
23 on site in the event the customer called and
24 wanted it returned?

10:53:04

25 A. That's correct.

10:53:18

1 Q. I'm showing you what I've marked
2 for purposes of identification as EPA's Exhibit
3 5Q. Do you recognize what's shown in that
4 photograph?

5 A. Yes. These are drums of dirty
6 material. They either have dirty material or
7 they're emptied.

10:53:34

8 Q. And I see they're stacked on
9 pallets?

10 A. Yes, they are. And that is the
11 back of the property. The building you see is
12 across the river on Washington Avenue.

10:53:47

13 Q. Now, I'm showing you a photo I've
14 marked for purposes of identification as EPA's
15 Exhibit 5V. Do you recognize what's shown in
16 photograph 5V?

10:54:05

17 A. This is Chemical Service
18 Corporation.

19 (Discussion off the record.)

20 MR. KAISER: Let's take that back.

10:54:27

21 Q. We've re-marked the photograph.
22 You now have in front of you what's marked as
23 EPA's Exhibit 5R?

24 A. This is Chemical Service building
25 and this is 1965.

10:54:45

1 Q. Do you know what happened, what are
2 we viewing there?

3 A. There was an explosion and my
4 husband was injured.

5 Q. What day of the week did that
6 explosion occur?

10:54:57

7 A. It was on a Saturday morning.

8 Q. Do you understand about what time
9 of day and how the explosion occurred?

10 A. It was around 10:00 in the morning.
11 My husband unlocked the door and was going to
12 go in and he flipped the light on and the
13 building blew up.

10:55:05

14 Q. What happened to your husband?

15 A. He was burned badly.

10:55:23

16 Q. And is it your understanding he
17 exited or came out that door that we see?

18 A. He ran out that door. And the
19 cleaning lady was in the office next door and
20 she ran out and rolled him in the snow to get
21 the fire off of him. His clothes were all
22 burned off.

10:55:37

23 Q. Did you actually go down to the
24 site that Saturday morning of the explosion?

25 A. Yes, I did. She sent her husband

10:55:51

1 after me, the cleaning lady, and he picked me
2 up and I went to the site. I saw what
3 happened. But I went right to the hospital.

4 Q. Did you see the building on fire as
5 it's shown in 5R?

10:56:05

6 A. Yes, I did. Yes. Material in the
7 building was acetone. And there was a break in
8 the switch wire which caused the explosion, the
9 spark.

10 Q. I'm showing you a photograph we
11 marked for purposes of identification as EPA's
12 5S. Do you recognize what's shown in that
13 photograph?

10:56:28

14 A. Yes. This is Chemical Service
15 building and it shows the fire and the
16 explosion, after the explosion.

10:56:36

17 Q. And then again you saw the building
18 in that condition that Saturday morning?

19 A. Yes, I did.

20 Q. I'm showing you what's marked for
21 purposes of identification as EPA's Exhibit 5T.
22 Do you recognize what's shown in Exhibit 5T?

10:56:55

23 A. Yes. This is a picture of the
24 building, I believe it might have been the next
25 day. I may have taken this myself. But it

10:57:12

1 shows the damage to the building from the
2 explosion.

3 Q. And that was in 1965?

4 A. Yes.

5 Q. Do you recall what month that
6 occurred?

10:57:20

7 A. I don't recall what month. It was
8 winter.

9 Q. Right there was the snow on the
10 ground.

10:57:28

11 A. Uh-huh.

12 Q. And those drums in the foreground,
13 do you know what may or may not have been in
14 those drums?

15 A. I don't know. No.

10:57:36

16 Q. I'm showing you what I've marked
17 for purposes of identification as EPA's Exhibit
18 5U. Do you recognize what's shown in
19 photograph 5U?

20 A. It's more pictures of the damage to
21 the building from the explosion, only this is a
22 different view. This is a back view.

10:57:47

23 Q. What would have been in the
24 building at the time of the explosion?

25 A. Acetone.

10:58:01

1 Q. And acetone, how was the acetone
2 contained?

3 A. The acetone was in a tank for
4 process.

5 Q. Do you know the size of the tank? 10:58:14

6 A. No, I don't.

7 Q. So the acetone, were there drums
8 stored in the building or it was only --

9 A. No. They weren't stored inside the
10 building, no. 10:58:29

11 Q. So the tank was filled with dirty
12 product awaiting processing?

13 A. Yeah.

14 Q. 5V, do you recognize what's shown
15 in the photograph we've marked for purposes of
16 identification as EPA Exhibit 5V? 10:58:47

17 A. Yes. This is another picture of
18 the damage caused by the explosion to Chemical
19 Service. This is by the road. By the street.

20 Q. I'm now showing you photograph 5W.
21 Do you recognize what's shown in photograph 5W? 10:59:10

22 A. This is an interior picture of
23 Chemical Service Corporation after the
24 explosion.

25 Q. So we're looking at what was inside 10:59:24

1 that building?

2 A. Yes.

3 Q. And what do we see there? Can you
4 describe for us what we're looking at?

5 A. Not really. Not really.

10:59:37

6 Q. But that's what it looked like
7 after the explosion and the fire?

8 A. Uh-huh. I wasn't really familiar
9 with their process.

10 Q. Is it fair to say you were more
11 familiar with the processes of Obitts Chemical?

10:59:51

12 A. That's true.

13 Q. 5X, do you recognize what's shown
14 in the photograph we've marked for purposes of
15 identification as EPA's Exhibit 5X?

11:00:03

16 A. This is inside the building and it
17 is a tank.

18 Q. Again, when you say the building,
19 that's the Chemical Service building?

20 A. Chemical Service Corporation.

11:00:16

21 Q. I'm showing you photograph 5Y,
22 EPA's Exhibit 5Y. Do you recognize what's
23 shown in photograph 5Y?

24 A. It looks like they're demolishing
25 the rest of the building in this picture.

11:00:33

1 Q. When you say the building, you're
2 referring to the Chemical Service?

3 A. Chemical Service Corporation. And
4 this was done by a outside contractor. It's
5 not our equipment. 11:00:43

6 Q. I'm showing you a photograph we've
7 marked for purposes of identification as 5Z?

8 A. This is showing more damage that
9 was done to the Chemical Service Corporation
10 building. I do not recognize the man in the 11:00:58
11 photo. He most likely was in the cleanup
12 process.

13 Q. I'm showing you a photograph we've
14 now marked for purposes of identification as
15 5AA, do you recognize what's shown in 5AA? 11:01:15

16 A. This is the Chemical Service
17 Corporation building after the explosion.

18 Q. 5BB, do you recognize what's shown
19 in 5BB? I recognize it's a somewhat dark
20 photograph. 11:01:35

21 A. I'm not seeing too good.

22 Q. Can't see it too well?

23 A. That is a Chemical Service
24 Corporation building. In the background is
25 part of the building that was called the tower 11:01:48

1 and it was part of the processing.

2 Q. And the tower, what did that refer
3 to?

4 A. It was where the chemicals were
5 processed in the tower.

11:01:59

6 Q. That was part of the distillation
7 column?

8 A. Yes.

9 Q. I'm showing you photograph 5CC, do
10 you recognize what's shown in that photograph?

11:02:13

11 A. This is showing debris from the
12 explosion at Chemical Service Corporation. The
13 debris in the building. This is the back view.

14 Q. 5DD, I'm not sure if there's --
15 looks like you have a copy. I don't know that
16 I have a copy that I could put on the overhead
17 of 5DD. I may need to make sure I have a copy
18 for the court reporter.

11:02:40

19 But 5DD, what do you see in 5DD?

20 A. I'm really not familiar with this
21 equipment.

11:02:57

22 Q. Is that a Chemical Service?

23 A. This is Chemical Service
24 Corporation building. It's a cement block
25 building. It's the only cement block building

11:03:05

1 we had.

2 Q. And finally photograph 5EE, do you
3 recognize what's shown in that photograph?

4 A. This is the interior of the
5 Chemical Service Corporation after the
6 explosion. It's a tank, but I don't know how
7 it was used.

11:03:18

8 Q. All right. And all these
9 photographs that we've reviewed now, these
10 color photographs that we've marked for
11 purposes of identification as EPA's Exhibits 5A
12 through 5EE, do those photographs all truly and
13 accurately represent the conditions at your
14 property at the time the photographs were
15 taken?

11:03:35

11:03:52

16 A. Yes, they do.

17 Q. Thank you.

18 (Discussion off the record.)

19 (Recess had.)

20 MR. KAISER: If we could have the
21 record reflect we took a approximately 15
22 minute break. We began the deposition
23 approximately 10:00 a.m., conducted some direct
24 examination for about one hour, and we resumed
25 at a little past 11:15.

11:20:36

11:20:49

1 Mrs. Obitts, I remind you you're
2 still under oath.

3 THE WITNESS: Yes.

4 Q. If at any time you don't understand
5 a question I ask, just ask me to rephrase. And
6 if you could keep your voice up so that
7 everyone here can understand and hear your
8 answers.

11:20:58

9 And if you could answer yes or no
10 to questions, so that the court reporter can
11 get a clear record of our deposition this
12 morning, we'd all appreciate it.

11:21:08

13 With that as background, I'd like
14 to talk with you now generally about the
15 process that Obitts Chemical employed and how
16 they would receive an order from a client,
17 respond to that order, process the order.

11:21:22

18 Take us through kind of a typical,
19 from the minute the phone rings to the minute
20 you finally get paid for the services, how that
21 process took place at Obitts Chemicals between
22 1962 and roughly 1974, if you could describe
23 for us that process please?

11:21:45

24 A. We were in the business of
25 reclaiming dirty solvent and returning them to

11:22:04

1 the customer from whom we got them. We would
2 get a phone call for a pickup and we would send
3 either a van or a dirty tanker to the place of
4 business.

5 We would pick up the material, 11:22:22
6 bring it to our plant, and put it through the
7 processing plant, which was a process of
8 distillation. The clean material would be put
9 either in drums or a clean tanker and delivered
10 back to the customer when it was finished. 11:22:39

11 Q. Now, when you say we would get a
12 call, where would that call come from?

13 A. It would come from the company who
14 wanted their material reclaimed.

15 Q. Who would typically answer that 11:22:51
16 call?

17 A. I would.

18 Q. How would you memorialize the
19 conversation you had with the customer?

20 A. I would give them an approximate 11:23:02
21 day and time of pickup. I would confer with
22 Jim Jackson, our foreman who basically ran the
23 scheduling, because he knew when the material
24 would be ready. And we would have a
25 conversation about it. And if the time I gave 11:23:21

1 the customer was okay, that's the way it was.
2 If we had to change it, I would call them back
3 and tell them.

4 Q. Now Jim Jackson, was he located in
5 the office with you? 11:23:34

6 A. No. He was in the plant. He was
7 all over the place. He ran the whole show.

8 Q. Who would dispatch the truck to
9 make the pickup?

10 A. I would dispatch the truck. But I 11:23:44
11 would have to get his okay.

12 Q. What was the process for getting
13 his okay?

14 A. I would call him to the office. We
15 had a page system. If I wanted to talk to him 11:23:56
16 I would page him on the pager and he would come
17 to the office.

18 Q. Who would make the decision whether
19 the send the flatbed truck or straight truck or
20 whether to send the tanker truck? 11:24:09

21 A. Well, I would know which one had to
22 go out, because I would know what material was
23 picked up. I would know if it was drums or
24 bulk material.

25 And then when it came in I would 11:24:20

1 type it on a sheet and we would call that
2 material on hand. And when it went out I would
3 cross it off the sheet.

4 Q. You would call it material on hand
5 as soon as you had the order for pickup?

11:24:33

6 A. As soon as it was picked up they
7 brought me a paper which showed what we picked
8 up and how many gallons or how many drums.

9 Q. Would you give any piece of paper
10 or direction to the driver?

11:24:46

11 A. Yes.

12 Q. How would the driver know where to
13 go?

14 A. He had a bill of lading.

15 Q. You --

11:24:53

16 A. I made that out.

17 Q. You prepared those?

18 A. Yes.

19 Q. What would you do with the bill of
20 lading?

11:24:58

21 A. Give it to the foreman and he would
22 give it to the truck driver.

23 Q. And then the driver would go pick
24 up the material?

25 A. Yes. And they would give us papers

11:25:11

1 with what we picked up.

2 Q. Who would give you papers?

3 A. The customer would give us a paper
4 as to what was picked up.

5 Q. What type of information would be
6 on that paper?

11:25:20

7 A. It would be the approximate amount
8 of gallons or drums and the material.

9 Q. What would you do with that paper?

10 A. Mr. Jackson would give it to me and
11 I would record it.

11:25:31

12 Q. Where would you record it?

13 A. I would record it on this sheet,
14 that that's things that we picked up and now we
15 have them on hand.

11:25:42

16 Q. So on hand means you picked them up
17 and they're now in --

18 A. In our possession.

19 Q. -- in your possession on your site?

20 A. Yes.

11:25:50

21 Q. What would happen to those
22 materials on site?

23 A. They would be processed through our
24 processing system, which was a distillation.

25 And when they were clean we would schedule the

11:26:00

1 delivery back to the customer.

2 Q. Who would schedule the delivery
3 back to the customer?

4 A. Mr. Jackson. He would tell me
5 when. 11:26:11

6 Q. Would you make any written record
7 of the return to the customer?

8 A. We would make a bill of lading to
9 go back with the clean material. And then when
10 it was all returned, they signed for it. And 11:26:22
11 he would give me, Mr. Jackson would give me the
12 papers and I would make an invoice.

13 Q. So the papers would be then
14 returned from the customer indicating they'd
15 received the clean solvent, Mr. Jackson would 11:26:36
16 give those papers to you?

17 A. Yes.

18 Q. And what record would you create or
19 maintain?

20 A. I would record it in my ledger and 11:26:44
21 then I had a file which I filed all the papers
22 for each company.

23 Q. For what period of time did you do
24 the work you just described personally, receive
25 the calls, confer with Mr. Jackson for the 11:26:55

1 pickup, confer with Mr. Jackson for the return
2 and prepare invoices and so forth?

3 A. From the time I started working
4 there in the early '60s until 1974 when we sold
5 the business. It was really earlier than that. 11:27:19

6 Q. Did you do those same services for
7 Chemical Services?

8 A. Yes, I did.

9 Q. At any point did you have anyone
10 assist you with those duties? 11:27:23

11 A. When my work load got rather heavy
12 I hired a secretary to help me do this. She
13 would do the things that I was doing and I also
14 taught her to do payroll.

15 Q. Did you oversee the secretary's
16 work? 11:27:38

17 A. Yes, I did. I worked there too.

18 Q. Did you continue to have personal
19 knowledge of the customers and --

20 A. Yes, every day. 11:27:46

21 Q. How would you invoice the
22 customers? At what point would you prepare an
23 invoice?

24 A. As soon as I received the papers
25 that they had received the material I would 11:27:55

1 invoice the customer.

2 Q. And who would prepare the invoice?

3 A. I would. Either me or my

4 secretary.

5 Q. And who would receive payments from
6 the customers?

11:28:05

7 A. It would come to Obitts Chemical.

8 Q. Who typically would open the mail
9 that contained the checks or payments?

10 A. Either me or my husband.

11:28:17

11 Q. Did you maintain the ledger of
12 accounts indicating payments and balances owed?

13 A. Yes, I did.

14 Q. You personally did that?

15 A. Yes, I did.

11:28:27

16 Q. With that in mind as your personal
17 knowledge of the business practices at Obitts
18 Chemicals, have you had an opportunity to think
19 about and talk with Mr. Nash and myself in an
20 effort to identify companies that did business
21 with Obitts Chemicals?

11:28:45

22 A. Yes, I did.

23 Q. In fact, when I was at your house
24 yesterday afternoon that was one of the
25 subjects we discussed, wasn't it?

11:28:55

1 A. Yes, it was.

2 Q. And one of the things we did was go
3 either on the Notice of Deposition or on the
4 Amended Notice of Deposition, there's a list of
5 companies to which USEPA had sent notice, is
6 that right? 11:29:08

7 A. That's right.

8 Q. And in fact, that's Attachment A of
9 the Notice of Deposition, EPA's Exhibit 2,
10 correct? 11:29:19

11 A. Yes.

12 Q. And that's the document you're
13 looking at right now, is it not?

14 A. Yes.

15 Q. Were you able to go down that list
16 and identify companies that you recall doing
17 business with? 11:29:25

18 A. Yes, I did.

19 Q. Could you review that with us. Can
20 you identify those companies that did business
21 with Obitts Chemicals between 1962 and 1974? 11:29:44

22 A. Okay. Addressograph/Multigraph.

23 Q. Was one of your --

24 A. Was one of our customers.

25 Fasson. I don't know it by Avery, 11:30:05

1 but I know it by Fasson.

2 BF Goodrich, Bailey Meter Company,
3 Beaver Paint Company, Cuyahoga Chemical
4 Company, Dow Chemical Company, Fisher Price
5 Toys, Glidden Company, Goodyear Tire & Rubber, 11:30:32
6 Jamestown Paint & Varnish Company, Sherwin
7 Williams Company, Dow Chemical Company,
8 Uniroyal.

9 That's all I have marked.

10 Q. Those are the ones that you've 11:30:52
11 marked on the notice list as having been
12 customers of Obitts Chemical --

13 A. Yes.

14 Q. -- between 1962 and 1974?

15 A. Yes. 11:31:01

16 Q. Now, based on your knowledge of
17 Obitts's business practices and contacts with
18 its customer base, do you have an opinion as to
19 who were the biggest customers of Obitts
20 Chemical between the periods 1962 and 1974? 11:31:19

21 MR. MILLICAN: Objection.

22 Q. Mrs. Obitts, if you could wait,
23 what we'd like to do now is get the objection
24 on the record and preserved in that manner.
25 And then I'll ask that you answer the question. 11:31:35

1 So if we could hear the basis of
2 the objection?

3 MR. MILLICAN: Form.

4 MR. KAISER: Form of the question.
5 Anything else? 11:31:47

6 MR. MILLICAN: Calls for an
7 opinion.

8 MR. KAISER: Any other bases?

9 MR. MILLICAN: No.

10 MR. KAISER: Any other objections 11:31:54
11 to the question?

12 Jim Millican, who do you represent?

13 MR. MILLICAN: Glidden.

14 MR. KAISER: Glidden Company.

15 All right. The objection is so 11:32:09
16 noted.

17 Q. And subject to that objection, Mrs.
18 Obitts, you may answer the question. And if
19 you don't remember the question we could have
20 the court reporter read the question back to 11:32:18
21 you.

22 A. Yes. You asked me who were the
23 biggest customers of ours.

24 Q. Yes. If you have an opinion who
25 were the biggest customers of Obitts Chemical 11:32:27

1 between 1962 and 1974?

2 A. Sherwin Williams Company and
3 Glidden Company.

4 Q. What is the basis for your opinion
5 that Sherwin Williams Company was one of the
6 two biggest customers of Obitts Chemical
7 between 1962 and 1974?

11:32:38

8 A. The basis is the amount of material
9 that we processed for them.

10 Q. And your knowledge of the amount of
11 material, how did you acquire your knowledge
12 about the amount of material Obitts Chemicals
13 processed for Sherwin Williams between 1962 and
14 1974?

11:32:51

15 A. I scheduled the papers. I received
16 all the papers as to what was picked up and
17 what was delivered.

11:33:07

18 Q. Did you also send the invoices?

19 A. I sent the invoices out.

20 Q. Did you receive payments from
21 Sherwin Williams?

11:33:17

22 A. Yes, we did.

23 Q. And with respect to Glidden

24 Company, what is the basis for your opinion

25 that Glidden Company was one of the two biggest

11:33:26

1 customers of Obitts Chemicals between 1962 and
2 1974?

3 A. On the same basis of material we
4 picked up and returned to them, the invoices I
5 made out and the money I received from them.

11:33:41

6 Q. Now, with respect to Sherwin
7 Williams, do you have a recollection of how
8 often Obitts Chemicals would pick up material
9 from Sherwin Williams?

10 A. It would be once or twice a week.

11:34:01

11 Q. Do you recall where the Sherwin
12 Williams facility was located?

13 A. No. I was never -- no. I didn't
14 go there. I don't remember from the invoices.

15 Q. Once or twice a week. And what
16 would you pick up the material from Sherwin
17 Williams in?

11:34:16

18 A. In a tanker, a dirty tanker, and
19 deliver it back in a clean tanker.

20 Q. What volume of material would
21 Obitts Chemicals pick up from Sherwin Williams?

11:34:29

22 A. It would be four or 5,000 gallons
23 at a time.

24 Q. And during this period, 1962 to
25 1974, was the business Obitts Chemical had with

11:34:50

1 Sherwin Williams relatively constant?

2 A. Yes, it was.

3 Q. And based on your personal
4 knowledge of the records and business practices
5 of Obitts Chemicals, it's your testimony that
6 once or twice a week Obitts Chemicals would
7 pick up with a tanker truck four to 5,000
8 gallons of materials from Sherwin Williams?

11:35:03

9 A. That's correct.

10 Q. And each time it would pick up,
11 each time it would go to the Sherwin Williams
12 facility it would pick up four to 5,000 gallons
13 of material?

11:35:16

14 A. Yes.

15 Q. Do you remember any of the names of
16 the people that you dealt with or who would
17 call in the order, who you would communicate
18 with at Sherwin Williams?

11:35:29

19 A. We dealt with a Mr. Tom Fancher.

20 Q. Can you spell that?

11:35:42

21 A. F A N C H E R.

22 Q. Do you know what Mr. Fancher's
23 position was with Sherwin Williams?

24 A. No. But he's the one that always
25 called me for the pickup.

11:35:54

1 Q. And you would speak to him once or
2 twice a week?

3 A. Yes.

4 Q. Was Mr. Fancher the person you
5 spoke with routinely between 1962 and 1974 to
6 schedule pickups of materials from Sherwin
7 Williams?

11:36:03

8 A. Yes, he was.

9 Q. With respect to Glidden Company,
10 how often would Obitts Chemicals pick up
11 materials from the Glidden Company facility?

11:36:16

12 A. About once a week.

13 Q. And between 1962 and 1974 how would
14 you characterize the consistency of the
15 business Obitts Chemical had with Glidden
16 Company?

11:36:38

17 MR. MILLICAN: Objection.

18 MR. KAISER: Basis?

19 MR. MILLICAN: Vague.

20 MR. KAISER: So recorded.

11:36:46

21 Q. You may answer the question.

22 A. What was the question?

23 (Record read.)

24 A. What do you mean by consistency?

25 Q. Was it pretty steady, the business,

11:37:07

1 or was it -- how often did you go to the
2 Glidden facility?

3 A. We went there --

4 MR. MILLICAN: Objection.

5 A. We went there about once a week and
6 it was pretty steady.

11:37:17

7 Q. And that was once a week throughout
8 this period of 1962 to 1974?

9 A. Yes, sir.

10 Q. And how much material would you
11 pick up during those weekly runs to the Glidden
12 Company?

11:37:26

13 A. About 4,000 gallons in a tanker.

14 Q. And do you recall the names of any
15 of the people you dealt with at the Glidden
16 Company?

11:37:37

17 A. We dealt with John Bosch. B O S C
18 H.

19 Q. Do you recall any other names?

20 A. No.

11:37:52

21 Q. Mr. Bosch was the Glidden
22 representative that you dealt with?

23 A. Yes.

24 Q. And these communications were
25 principally by telephone?

11:37:58

1 A. Yes, they were.

2 Q. And of course supported by these
3 bill of ladings, both when you sent the truck
4 out to pick up solvent and when you sent it
5 bank to drop off clean solvent?

11:38:10

6 A. Yes.

7 Q. And there were also invoices that
8 you sent to Glidden Company?

9 A. Yes.

10 Q. And payments you received from
11 Glidden Company?

11:38:17

12 A. Yes.

13 Q. All this paperwork was paperwork
14 that you personally handled between 1962 and
15 1974?

11:38:25

16 A. Yes, it was.

17 Q. With the exception of some small
18 portion of that work that this secretary that
19 you oversaw assisted you with?

20 A. Yes.

11:38:33

21 Q. So in terms of the biggest
22 customers for Obitts Chemical between 1962 and
23 1974, it's your testimony and your opinion that
24 those two biggest customers were Sherwin
25 Williams and Glidden Company?

11:38:52

1 A. Yes.

2 MR. HEER: Objection.

3 MR. KAISER: Basis?

4 MR. HEER: Asked and answered
5 several times.

11:39:01

6 Q. Now respect to other customers, can
7 you rank any of these? You've identified other
8 customers?

9 A. Yes.

10 Q. If we've got in your recollection,
11 in your opinion Sherwin Williams and Glidden at
12 the top, who are other customers that also had
13 large volumes of business with Obitts Chemical
14 from between 1962 and 1974?

11:39:12

15 MR. PANZA: For point of
16 clarification, not an objection, are we dealing
17 with the same list that we've already
18 identified or are we now expanding it?

11:39:31

19 MR. KAISER: It's possible that
20 this will go off the list, because I'm asking
21 her to testify from her memory.

11:39:39

22 A. We picked up periodically from
23 other companies. It would be on a basis of
24 when they called in and had enough dirty
25 material for us to pick up.

11:39:58

1 Fisher Price Toys, it may have been
2 once a month.

3 Q. I'm going to ask you to return to
4 the list that you had talked about earlier,
5 Attachment A to the deposition notice. And you
6 had identified, as you recall, companies that
7 were customers of Obitts Chemical between 1962
8 and 1974.

11:40:21

9 I believe you said that
10 Addressograph/Multigraph was one of the
11 customers?

11:40:33

12 A. Yes, but that was not a big
13 customer. It was once in a while they would
14 call and ask us to pick up maybe 10 drums. It
15 was not a large quantity.

11:40:45

16 Q. When you say once in a while, how
17 often would that be?

18 A. Maybe once every two or three
19 months.

20 Q. Was that again consistent over the
21 time period, '62 to '74?

11:40:54

22 A. Yes.

23 Q. Going down the list, number eight,
24 Avery Fasson. F A S S O N.

25 A. That was on the same basis. They

11:41:12

1 would call us when they had a few drums to pick
2 up and we would pick them up and reclaim them
3 and deliver them back. And that might have
4 been on a basis of three to four months.

5 Q. Every three to four months they
6 would call?

11:41:26

7 A. Yes.

8 Q. And it was just a few drums?

9 A. Yes.

10 Q. And when you say few, can you be
11 any more precise?

11:41:31

12 A. I would say 10 to 12 drums of
13 material, as I recall.

14 Q. And BF Goodrich?

15 A. BF Goodrich was a tanker. We would
16 pick up three to 4,000 gallons at a time and
17 that would be about once a month.

11:41:46

18 Q. Again, was that constant between
19 '62 and '74?

20 A. Yes.

11:42:03

21 Bailey Meter Company was another
22 small order company. It would be a matter of
23 10 or 12 drums that we picked up from them and
24 reclaim and return, maybe every four months.

25 Q. Every four months again referring

11:42:23

1 to a period every four months between '62 and
2 '74?

3 A. Yes, sir.

4 Beaver Paint Company was picked up
5 in a tanker and returned in a tanker. And that 11:42:33
6 might be every two to three months that we
7 would pick up there.

8 Q. Again between 1962 and '74?

9 A. Between 1962 and '74. Yes.

10 Q. And the volume of the tanker? 11:42:50

11 A. It would be about 3,000 to 4,000
12 gallons. We could always pick up less, but we
13 could never pick up more.

14 MS. O'BRYAN: Can I ask Mrs. Obitts
15 to read the number that correlates with the 11:43:08
16 party you're discussing so we could follow
17 along?

18 MR. KAISER: I'll be happy to.

19 Q. We were talking about Beaver Paint
20 Company, that's number 13 on the list? 11:43:17

21 A. Uh-huh.

22 Q. What's the next company that you
23 recall was a customer of Obitts Chemical?

24 A. Cuyahoga Chemical Company.

25 Q. What number is that? 11:43:32

1 A. Number 24.

2 Q. Number 24. How frequently did you
3 do business with Cuyahoga Chemical Company?

4 A. That was infrequent and it was a
5 matter of two or three drums. 11:43:40

6 Q. How often?

7 A. About every three months.

8 Q. What's the next company you recall
9 Obitts Chemical doing business with?

10 A. Dow Chemical Company. 11:44:02

11 Q. What number are they?

12 A. Number 30.

13 Q. How often would you make a pickup
14 at Dow Chemical Company?

15 A. Approximately once every two 11:44:10
16 months. It would be tanker of dirty material
17 and return them a clean tanker.

18 And I already mentioned Fisher
19 Price.

20 Q. How often would you go to Fisher 11:44:23
21 Price, number 31?

22 A. We'd go to Fisher Price in the
23 season they were making toys at least once a
24 month, sometimes twice a month. But off season
25 it would be about every other month. This is 11:44:40

1 before Christmas season was rather busy for
2 them.

3 Q. Would you send the tanker or pick
4 up drums from Fisher Price?

5 A. That was drums, 62 drums at a time.

11:44:57

6 Q. How do you recall specifically 62
7 drums from Fisher Price?

8 A. Because that's what our van would
9 hold. You never doubled it. That was in New
10 York.

11:45:19

11 Q. That was up in the Buffalo area?

12 A. Yes.

13 Q. Who was the next company you
14 recognize?

15 A. Goodyear Tire & Rubber.

11:45:27

16 Q. What number are they?

17 A. 37. We already mentioned Glidden
18 before, that's above.

19 Q. Yes. Glidden, 36, we did mention.

20 A. Yes.

11:45:40

21 Q. Goodyear Tire & Rubber, 37, how
22 often would you pick up?

23 A. They were in Akron and it would be
24 about once every other month. And that brings
25 to mind somebody else.

11:45:56

1 Q. Well, as long as it's bringing that
2 to mind, tell us who does it bring to mind?

3 A. Allside.

4 Q. Allside?

5 A. Uh-huh. It's not on here.

11:46:06

6 Q. Not on the list. But that's a
7 company you recall doing business with?

8 A. Yeah. They were a fairly good
9 customer, about once every other month there
10 would be a tanker full.

11:46:17

11 Q. Do you recall what city Allside was
12 located in?

13 A. Akron.

14 Q. Goodyear Tire & Rubber, once every
15 other month, what type of pickup would it be?

11:46:33

16 A. It would be in the dirty tanker.

17 Q. And again the quantity?

18 A. It would be about 4,000, three to
19 4,000 gallons.

20 Q. Who was the next customer you
21 recognize?

11:46:54

22 A. Number 44, Jamestown Paint &
23 Varnish, we would pick them up about every two
24 months. It would be a dirty tanker. And it
25 would be 4,000 gallons.

11:47:07

1 Q. Was that again consistent between
2 1962 and 1974?

3 A. Yes. That was consistent between
4 '62 and '74.

5 Q. Who do you next recognize?

11:47:41

6 A. We've already mentioned Sherwin
7 Williams. So we'll go to 68.

8 Q. What number is Sherwin Williams?

9 A. Sherwin Williams is 61.

10 Did we mention Dow before?

11:47:53

11 Q. Yes. Dow is number 30.

12 A. I think we did that one already.

13 And Uniroyal.

14 Q. What number is Uniroyal?

15 A. It's 69.

11:48:12

16 Q. How often would you go to the
17 Uniroyal facility?

18 A. About once every six weeks. That
19 was a dirty tanker and we would pick up a
20 tanker full of dirty material.

11:48:29

21 Q. And again was that consistent
22 between the years 1962 and 1974?

23 A. Yes. That was consistent between
24 '62 and '74.

25 And that's all that's on this list.

11:48:42

1 Q. Now, when you'd send the tanker, I
2 mean typically, do you have knowledge as to
3 whether you'd ever pick up a half a tanker full
4 or were you always picking up a full tanker?

5 A. They didn't generally call us until
6 they had a full tanker load. It wasn't
7 economical to pick up half a load.

8 Q. Are there any other companies that
9 come to mind that aren't on this list that you
10 recall Obitts Chemical doing business with
11 between 1962 and 1974?

12 A. There were other companies, but I
13 can't bring them all to mind.

14 Q. All right. I may show you some
15 documents that may help you.

16 A. Okay. This was 40 years ago.

17 Q. I'm showing you what I'm marking
18 for purposes of identification as EPA's Exhibit
19 6.

20 Mrs. Obitts, I'm showing you a one,
21 two, three, four, five, six page legal sized
22 document titled dirty inventory. I want you to
23 take a minute and take a look at that. I'm
24 going to hand out a limited number of copies.

25 Mrs. Obitts, have you had a chance

1 to look over this document that we've marked
2 for purposes of identification as USEPA's
3 Exhibit 6?

4 A. Yes, I have.

5 Q. Is that a document we looked at at
6 your house yesterday afternoon?

11:52:59

7 A. Yes.

8 Q. Did you go through this list in an
9 effort to identify other companies that Obitts
10 Chemicals did business with between 1962 and
11 1974?

11:53:11

12 A. Yes, I did.

13 Q. I understand that we may identify a
14 second time companies that you identified when
15 you looked through this deposition notice. But
16 if you could go down this list slowly and
17 identify the companies on this list that you
18 recognize as having been customers of Obitts
19 Chemical between 1962 and 1974?

11:53:22

20 MR. McWILLIAMS: Objection.

11:53:56

21 MR. KAISER: Basis?

22 MR. McWILLIAMS: No foundation.
23 Form of the question.

24 Q. Mrs. Obitts, you may, by reference
25 to this document identify. Let me just say

11:54:00

1 this. Does looking at this document refresh
2 your recollection with respect to companies
3 that Obitts Chemicals did business with?

4 A. Yes, it does.

5 Q. Does it assist you in holding on to
6 that recollection by having that document in
7 front of you?

11:54:12

8 A. Yes, it does.

9 Q. Now, the testimony that you're
10 about to give, is that testimony that's based
11 on an actual memory you have, a recollection
12 that you have of the identity of customers that
13 did business with Obitts Chemical between 1962
14 and 1974?

11:54:21

15 A. Yes.

11:54:37

16 Q. Now on the basis of that personal
17 knowledge and that actual recollection, could
18 you identify, with reference to the list if
19 necessary, companies that were customers of
20 Obitts Chemical between 1962 and 1974?

11:54:51

21 A. Yes.

22 Q. Please do so.

23 A. TRW is one.

24 Do you want me to just go through
25 the list?

11:55:01

1 Q. Yes, if you would. And slowly so
2 we could roll down the chart.

3 A. Tropical Paint Corporation, General
4 Motors in Lordstown, BF Goodrich, Ashland
5 Chemical, Bison Corporation, Foseco, F O S E C 11:55:25
6 O, Incorporated, Goodyear Tire & Rubber, DuPont
7 Chemical, Avery Label, Sinclair & Valentine,
8 Kalcor Coating.

9 Q. If you could slow down one second.

10 MR. MILLICAN: Mr. Kaiser, can you 11:56:06
11 identify where this document came from?

12 MR. KAISER: Yes. As I understand
13 it, this document was produced to the United
14 States Environmental Protection Agency by
15 Chemical Recovery Systems. 11:56:15

16 And I'll represent to you that they
17 told USEPA that this was what they referred to
18 as a dirty inventory list, that is Chemical
19 Recovery Systems. And this was a manner in
20 which after 1974 Chemical Recovery Systems kept 11:56:32
21 track of inventory on-site and off-site.

22 That's the origin of the document.

23 MR. MILLICAN: You're not making
24 any representation that this witness had any
25 part in its preparation? 11:56:50

1 MR. KAISER: No.

2 THE WITNESS: No.

3 MR. KAISER: I'm using it
4 principally to refresh her recollection as to
5 the customers of Obitts Chemical between 1962
6 and 1974.

11:56:59

7 MR. MILLICAN: Thank you.

8 A. There's many people on this list
9 that were not our customers. And I'm just
10 reading the ones that I recognize as having
11 been our customers.

11:57:09

12 Q. The basis of your recognition is
13 your personal knowledge of the customers of
14 Obitts Chemical between 1962 and 1974?

15 A. That's correct.

11:57:25

16 Q. With that understanding, as to the
17 extent this refreshes again your actual
18 recollection, please continue down the list and
19 identify companies that were Obitts customers?

20 A. Where did I leave off? Sinclair &
21 Valentine.

11:57:43

22 Kalcor Coatings, Sprayon Products,
23 Fisher Price Toys, Sherwin Williams Company,
24 American Greetings Corporation, Uniroyal
25 Incorporated, Eagle Rubber Company, Whirlpool

11:58:13

1 Corporation in Clyde, Nordson Corporation,
2 Ashland Chemical Company, Goodyear Tire &
3 Rubber.

4 We've already named Jamestown Paint
5 & Varnish on here. 11:58:43

6 WJ Ruscoe Company, Beaver Paint
7 Company, Fasson, Browning-Ferris Industries,
8 Eagle Rubber, Sherwin Williams, Firestone Tire
9 & Rubber.

10 That's the end of the ones that are 11:59:11
11 on this list that were our customers.

12 Q. All right. Now I recognize that
13 some of the customers that you identified from
14 this dirty inventory list, EPA's Exhibit 6, are
15 the same as those you identified off of the 11:59:25
16 Notice of Deposition?

17 A. That's right.

18 Q. To the extent that you've
19 identified new customers --

20 A. That's correct. 11:59:37

21 Q. -- people who weren't on the
22 deposition notice, what I'd like to do is try
23 to go through the new customers and have you
24 tell us how often Obitts Chemicals did business
25 with them. 11:59:54

1 MR. PANZA: Steve, I notice the
2 exhibit this witness is viewing is highlighted?

3 MR. KAISER: Yes.

4 THE WITNESS: I did that.

5 MR. PANZA: Can you give us that so
6 we can --

12:00:03

7 MR. KAISER: Sure. I'll be happy
8 to.

9 Q. Mrs. Obitts, you're looking at
10 EPA's Exhibit 6, and there's some yellow
11 highlighting on there, is there not?

12:00:07

12 A. Yes.

13 Q. Do you know who put that
14 highlighting on there?

15 A. I saw this list yesterday. And I
16 highlighted the companies that I recognized as
17 doing business with.

12:00:15

18 Q. And you did that when Mr. Nash,
19 myself and Ms. Herring visited you at your home
20 yesterday afternoon?

12:00:27

21 A. Yes.

22 Q. And the list when we presented it
23 to you didn't have any highlighted markings on
24 it?

25 A. No, it did not.

12:00:35

1 Q. So those highlights that you're
2 looking at today, those are the ones you placed
3 on there yesterday?

4 A. Yes, they are.

5 Q. And again that was the process
6 of -- well, describe for the ladies and
7 gentlemen here this morning how it was you
8 determined which companies to highlight on that
9 exhibit, USEPA Exhibit 6?

12:00:43

10 A. As I read this list of many
11 companies, I would read a name that would bring
12 back the memory of having been one of my
13 customers, and I highlighted it because of
14 that.

12:00:57

15 MR. PANZA: I just want to, is the
16 highlighting consistent with her testimony this
17 morning?

12:01:17

18 In other words, once we get the
19 original document, if we review the
20 highlighting, would that be consistent with
21 those names that she mentioned this morning or
22 has she expanded the highlighting or testimony
23 outside of the highlighting?

12:01:25

24 I just want to know if they're
25 consistent.

12:01:37

1 MR. KAISER: I don't know that,
2 this morning she identified companies. I think
3 this list may have new companies on it. I
4 would not view it as consistent or
5 inconsistent. I would view it as consistent 12:01:50
6 and supplementing her earlier testimony.

7 MR. PANZA: That wasn't my
8 question. My inquiry was whether her testimony
9 this morning was consistent with her
10 highlighting of Exhibit 6, has she named any 12:02:03
11 companies this morning on Exhibit 6 that were
12 not highlighted?

13 MR. KAISER: I'll leave it to you
14 to make that analysis after for the record.
15 I'm just making the record. 12:02:15

16 THE WITNESS: Excuse me, sir. Not
17 all the companies are on this list.

18 MR. PANZA: I appreciate that.
19 First of all, I just noticed it was
20 highlighted. I was just trying to make a 12:02:27
21 determination as whether, when you were giving
22 the names of the companies off the list,
23 Exhibit 6, whether or not you were reading that
24 which you highlighted yesterday?

25 THE WITNESS: I highlighted this 12:02:38

1 list yesterday that I'm reading today. But
2 these are not all our customers. These are
3 some that didn't come to my mind until I read
4 the list.

5 MR. PANZA: Thank you.

12:02:51

6 Q. I'll ask just as a follow-up, and
7 perhaps clarification, perhaps not, as you went
8 down the list today, and the list being EPA
9 Exhibit 6, what you're looking at, did you see
10 any companies on there as you looked at the
11 list today that you now remember were customers
12 that when you looked at the list yesterday you
13 didn't identify as customers?

12:03:06

14 A. No. I don't see any additional
15 companies that I didn't identify yesterday.

12:03:20

16 Q. Thank you.

17 MR. PANZA: Thank you.

18 Q. With that as I hope clarification,
19 and without the intention but perhaps the
20 effect of repeating some of the testimony, if
21 we could go down and review the companies
22 identified on there.

12:03:37

23 And if you could, tell us how much
24 Obitts Chemicals did business with those
25 customers?

12:03:49

1 MR. MILLICAN: Steve, may I ask
2 another question. Did the list have a date on
3 it?

4 MR. KAISER: The list begins at the
5 top of page one with Century Plastics, which
6 has a date of 12-18. The second one is
7 Thermodisc and disc is spelled D I S C, and
8 that has a date of 1-5-74.

9 And then I see also Chemical
10 Recovery is listed as 1-13-75. So it suggests
11 to me that in the '74, '75 time frame, again
12 I'm not looking for this witness to lay a
13 foundation for the admission of this document.

14 MS. O'BRYAN: Are you asking, is
15 there a question now directed to the new
16 customers that she's identified, she's not
17 going back over previous testimony?

18 MR. KAISER: I'm going to try to
19 limit it that way. I'm not promising 100
20 percent success.

21 Q. All right, Mrs. Obitts, if you
22 could go down the dirty inventory list, USEPA
23 Exhibit 6, and as you go down that list by
24 company, tell us how often Obitts Chemical did
25 business with those companies?

1 A. TRW was an occasional customer. I
2 would say twice a year.

3 Q. Was it drums or the tanker?

4 A. Drums.

5 Q. Do you know how many drums?

12:05:22

6 A. I don't recall how many drums. I
7 don't want to guess. I don't recall.

8 Q. That's fine.

9 A. Tropical Paint Corporation was also
10 an occasional customer, two or three times a
11 year. They were in drums.

12:05:36

12 Q. Do you recall how many drums?

13 A. No.

14 General Motors, Lordstown, I would
15 say about four times a year. And when we
16 picked them up we picked them up with a dirty
17 tanker.

12:05:57

18 BF Goodrich, about every two months
19 and that was drum material, probably 15 to 25
20 drums at a time.

12:06:26

21 Q. How do you come up with that
22 figure?

23 A. I'm trying to bring it out of my
24 memory as I sit here and think about it. We
25 sent the straight truck. It doesn't hold more

12:06:38

1 than 30 drums. And I'm trying to remember
2 exactly how many that were on there. I would
3 say about 15 to 25 drums. It's hard to
4 remember. This is 40 years ago.

5 Q. All you can do is your best, Mrs.
6 Obitts. And if you don't recall, please don't
7 guess or speculate. But if you do, please tell
8 us what you recall.

9 A. Ashland Chemical was picked up in
10 the dirty tanker.

11 Q. About how often?

12 A. About every two months.

13 Bison Corporation I would say two
14 to three times a year. And it was a small
15 quantity of drums, 10 to 12.

16 Foseco Incorporated was also picked
17 up two or three times a year, was not a large
18 customer and it was in drums.

19 Q. Any basis for estimating the number
20 of drums?

21 A. No. I don't remember how many
22 drums.

23 Goodyear Tire & Rubber, we picked
24 up in a dirty tanker about every two to three
25 months. DuPont Chemical, about two to three

1 times a year and that was in drums, small
2 quantities. I'm not going to guess how many.

3 Avery Label Company was drum
4 material, about two or three times a year, and
5 it was not many drums at a time. Sinclair
6 Valentine was picked up in drums about three
7 times a year and they were small quantity.

12:08:55

8 Kalcor Coatings Company was
9 material picked up in drums about three times a
10 year. Fisher Price Toys was always a pickup of
11 62 drums, a truck full, and was returned to
12 them about every two months, a little more
13 often in the season they were making Christmas
14 toys.

12:09:25

15 Sherwin Williams Company was picked
16 up in a dirty tanker returned in the clean
17 tanker about once or twice a week. American
18 Greetings was picked up in drums, it would be
19 about 25 drums at a time, about every two
20 months.

12:10:00

12:10:32

21 Uniroyal was picked up in the dirty
22 tanker about once every two months. Eagle
23 Rubber was picked up in drums about every three
24 months. I don't remember how many. They were
25 not a big customer.

12:10:58

1 Whirlpool Corporation in Clyde,
2 Ohio, was picked up in drums about three times
3 a year. Nordson Corporation was picked up
4 maybe every two or three months, that was in
5 drums usually about 30 at a time.

12:11:34

6 Ashland Chemical Company was picked
7 up in the dirty tanker about every two months.
8 Jamestown Paint & Varnish was picked up in the
9 dirty tanker about every two or three months.
10 That would be a full tanker, four to 5,000
11 gallons.

12:12:05

12 WJ Ruscoe Company was a smaller
13 type customer with drums and we only picked
14 them up a couple times a year. Beaver Paint
15 Company was drums, we picked up 62 at a time
16 about every two to three months.

12:12:31

17 Fasson Corporation we picked them
18 up in drums, I don't remember, it was about
19 every two or three months. Browning-Ferris
20 Industries was dirty tanker and we only picked
21 them up a couple times a year.

12:13:12

22 I guess that's it. These are
23 repeats.

24 Q. Again, your testimony right there,
25 Mrs. Obitts, was that from your personal

12:13:49

1 recollection?

2 A. Yes, sir.

3 MR. KAISER: I think we're at a
4 good time to take a break.

5 (Luncheon recess had.)

13:41:36

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1 AFTERNOON-SESSION (1:40 p.m.)

2 MR. KAISER: Let the record reflect
3 that we're resuming the deposition of Mrs.
4 Dorothy Obitts taken pursuant to subpoena
5 issued by the United States Environmental
6 Protection Agency Region 5.

13:42:30

7 It's now about 1:37 p.m.

8 CONTINUED EXAMINATION OF DOROTHY OBITTS
9 BY MR. KAISER:

10 Q. Mrs. Obitts, I remind you you're
11 still under oath.

13:42:40

12 I'd like to this afternoon show you
13 some documents that the United States
14 Environmental Protection Agency obtained from
15 Chemical Recovery Systems and ask you whether
16 you recognize the documents and whether you can
17 identify them.

13:42:53

18 I'd like to begin by showing you a
19 set of documents that I'm marking for purposes
20 of identification as United States
21 Environmental Protection Agency Exhibit 7.
22 It's a series of ledger sheets.

13:43:06

23 I'd ask you to take a look at
24 those, tell me if you recognize those?

25 A. Yes, I do.

13:43:28

1 Q. What do you recognize those to be?

2 A. This is truck milage.

3 Q. Mrs. Obitts, now you've had a

4 minute to take a look at those documents.

5 They're principally ledger documents, but

13:43:57

6 interspersed are some smaller tickets and

7 similar matters.

8 But, directing your attention for

9 the time being to the ledger itself, do you

10 recognize what that document is?

13:44:13

11 A. Yes. This is truck milage, for

12 reporting truck milage to the states,

13 principally Ohio, for the taxes.

14 Q. Is that a record maintained, can

15 you determine what company maintained that

13:44:29

16 record?

17 A. No. All that is written in here is

18 the city and state.

19 Q. Do you recognize the handwriting in

20 that ledger?

13:44:40

21 A. This is my handwriting.

22 Q. Can you tell by reference to any

23 portions of the ledger when you wrote those

24 entries?

25 A. 1972. It's marked on the entries.

13:44:52

1 Q. And again, what was the purpose for
2 maintaining that ledger?

3 A. For truck taxes that we had to
4 report to, principally Ohio, also other states.

5 Q. How did you get the information 13:45:06
6 that you entered into the ledger?

7 A. From our truck drivers.

8 Q. How would they report that
9 information to you?

10 A. They kept milage records. 13:45:17

11 Q. What information would you record
12 in the ledger?

13 A. I would record the city that the
14 truck went to, and the number of miles and
15 which vehicle. 13:45:28

16 Q. Can you read to us and read into
17 the record, for instance, a representative
18 transaction that you recorded in the ledger?

19 A. This as the White, which was a
20 tractor, and it was driven by Don Matthews and 13:45:44
21 there's cities listed, Solon, Ohio, Mansfield,
22 Buffalo, New York, Cleveland, Ohio, Warren,
23 Port Clinton, New Philadelphia, Akron,
24 Jamestown, New York, Meadville, Pennsylvania,
25 Dover, Ohio, Cleveland, Ohio, Alliance, Ohio, 13:46:06

1 Jamestown PA again.

2 Q. Do you know why trucks from Obitts
3 Chemical or Chemical Recovery Services would
4 have gone to those cities?

5 A. We were delivering clean solvents
6 to them.

13:46:18

7 Q. Is that a record of deliveries or
8 does it also record pickups?

9 A. It records the pickups too. Both.

10 Q. And you indicated that the ledger
11 you were just reading from, which was a page
12 selected from the middle, indicated in the
13 upper left, number seven, White. What does
14 that notation on the upper left-hand corner of
15 the ledger refer to?

13:46:28

13:46:43

16 A. That is a White tractor.

17 Q. Did you make similar notations on
18 the top of the other ledger pages to indicate
19 the type of truck?

20 A. Yes. We have listed number nine,
21 which was a Mack Truck. Number eight was a
22 Ford tractor. Number 10 was a Mack Truck.
23 Number seven was a White. And then back to
24 number eight, Ford.

13:46:53

25 Q. Were those in fact the types of

13:47:16

1 trucks that were owned and operated by Obitts
2 Chemical and Chemical Services --

3 A. Yes.

4 Q. -- in that era?

5 And you personally entered that
6 data in the ledgers?

13:47:28

7 A. Yes, I did.

8 Q. And that was entered into a ledger.
9 Was that information that you recorded in the
10 ordinary course of business of Obitts Chemical
11 and Chemical Services?

13:47:38

12 A. Yes, it is.

13 Q. As you review those pages do they
14 appear to be true and accurate copies, well,
15 actually true and accurate, those are the
16 originals?

13:47:48

17 A. These are the originals. Yes.

18 Q. And appear to be in the same or
19 similar condition as they were at the time you
20 made those entries?

13:48:00

21 A. Yes, they are.

22 Q. Thank you.

23 (Discussion off the record.)

24 Q. Mrs. Obitts, we're going to go
25 through this regrettably in some painstaking

13:49:17

1 detail. But I think that's what it's going to
2 take so we have a clear record of what we're
3 talking about here.

4 I'm going to show you, now just to
5 describe it, this is a ledger page that is a
6 green tint and it has blue ink in a person's
7 handwriting. And in the upper left-hand corner
8 we see the numbers 20185-011. And we see that
9 this is a record of the number nine Mack, is
10 that correct?

13:49:28

13:49:52

11 A. Yes.

12 Q. And I see in the upper right-hand
13 corner of this page, can you read into the
14 record what months are indicated in what year?

15 A. October, November and December
16 1972. And these were for quarterly reports.

13:50:02

17 Q. To be submitted?

18 A. To the state.

19 Q. To determine taxes?

20 A. Yes. Highway tax.

13:50:13

21 Q. Now, on the reverse side of this
22 same page I see in the upper left-hand corner,
23 can you read that number into the record?

24 A. 20185-0N. It's a number nine Mack.

25 Q. What time period is covered?

13:50:31

1 A. July, August, September 1972.

2 Q. Are all the entries on that page in
3 your handwriting?

4 A. Yes.

5 Q. And were all of those entries made
6 in the ordinary course of business?

13:50:42

7 A. Yes, they were.

8 Q. Now, I'm showing you a second
9 sheet, front side of it, can you again read for
10 the record what's in the upper left-hand
11 corner?

13:50:54

12 A. 20185-010.

13 Q. Which truck does this reference?

14 A. Number eight Ford.

15 Q. During what time period?

13:51:05

16 A. July, August and September 1972.

17 Q. Whose handwriting appears on that
18 page?

19 A. Mine.

20 Q. If you could reverse that page and
21 tell us if there's anything on the back?

13:51:16

22 A. It's the same. It's the number
23 eight Ford. It's October, November and
24 December 1972.

25 Q. Again, is that your handwriting on

13:51:35

1 the page?

2 A. Yes.

3 Q. Were all those entries made in the
4 ordinary course of business?

5 A. Yes. 13:51:43

6 Q. Now with respect to this third
7 sheet I'm giving you, what numbers appear in
8 the upper left-hand corner?

9 A. 36-52018500112.

10 Q. What truck is that? 13:52:02

11 A. Number 10 Mack.

12 Q. What time period?

13 A. July, August and September 1972.

14 Q. Again, is that all your
15 handwriting? 13:52:13

16 A. Yes.

17 Q. All of those entries made in the
18 ordinary course of business?

19 A. Yes, they were.

20 Q. Now the reverse side of that page? 13:52:20

21 A. October, November and December,
22 1972, the same truck, same tractor, and that
23 was in my handwriting.

24 Q. All right. Now I'm showing you a
25 fourth page from the ledger again, can you tell 13:52:40

1 us what's in that upper left-hand corner?

2 A. 20185-008. This was a number seven
3 White tractor.

4 Q. What time frame?

5 A. January, February and March 1972.

13:52:55

6 Q. All those entries, were those made
7 in your hand?

8 A. Yes.

9 Q. Were they made in the ordinary
10 course of business?

13:53:05

11 A. Yes, they were.

12 Q. And the reverse side of that page,
13 what if anything is on the reverse side?

14 A. It's also the number seven White,
15 and it's April, May and June 1972.

13:53:14

16 Q. Again all those entries made in
17 your hand?

18 A. Yes.

19 Q. In the ordinary course of business?

20 A. Yes.

13:53:24

21 Q. I'm showing you another page from
22 the document. Again if you could identify it
23 in the upper left-hand corner?

24 A. K20185 010. The number eight Ford.
25 January, February and March 1972.

13:53:41

1 Q. And the flip side of that page?

2 A. This is still the number eight
3 Ford. April, May and June 1972.

4 Q. Were all those entries on both
5 sides of that page made, did you make those?

13:53:57

6 A. Yes.

7 Q. Did you make them in the ordinary
8 course of business?

9 A. Yes.

10 Q. Showing you an additional page from
11 the ledger?

13:54:09

12 A. Number nine Mack tractor, January,
13 February, March 1972.

14 Q. And on the reverse side?

15 A. Number nine Mack, April, May and
16 June 1972.

13:54:24

17 Q. Is there a number in the upper
18 left-hand corner?

19 A. It's the same number.

20 Q. Could you read that into the record
21 please?

13:54:34

22 A. 20185011.

23 Q. And again all those entries, did
24 you make those?

25 A. Yes.

13:54:44

1 Q. Were they made in the ordinary
2 course of business?

3 A. Yes.

4 Q. Showing you yet another page from
5 that ledger, can you identify the page number?

13:54:53

6 A. This is the number eight Ford truck
7 milage, July, August, September 1971. The same
8 vehicle, K20185 010, the number eight Ford
9 October, November and December 1971.

10 Q. Who made those entries on both
11 sides of the page?

13:55:21

12 A. I did.

13 Q. Were they made in the ordinary
14 course of business?

15 A. Yes.

13:55:28

16 Q. Could you please identify this
17 page?

18 A. K20185008, truck milage October,
19 November and December 1971.

20 Q. And the other side?

13:55:46

21 A. And I wrote these.

22 Q. You wrote all of that?

23 A. Yes. K20185 008. Number seven
24 White, July, August, September 1971.

25 Q. Did you make all those entries?

13:56:01

1 A. I wrote those.

2 Q. Were they all made in the ordinary
3 course of business?

4 A. Yes.

5 Q. Do you recognize that page?

13:56:08

6 A. Yes.

7 Q. What is the number in the upper
8 left-hand corner?

9 A. 365201850011. July, August,
10 September 1971 truck milage. 20185011, number
11 nine Mack, October, November, December 1971.

13:56:21

12 Q. Were those all made in your own
13 hand?

14 A. Yes.

15 Q. And in the ordinary course of
16 business?

13:56:43

17 A. Yes.

18 Q. Now the Mack Truck, what was its
19 capacity or --

20 A. It was a tractor. It pulled the
21 tankers or the vans.

13:56:49

22 Q. And the Ford truck, what type of
23 truck was that?

24 A. It was a tractor. It would pull a
25 tanker or a van.

13:57:03

1 Q. Showing you another portion of the
2 ledger, could you identify that page?

3 A. K20185007 January, February, March
4 1971. And that's my handwriting. K20185007,
5 the number six White, which was a tractor,
6 April, May and June 1971. And I wrote this.

13:57:29

7 Q. Were those entries made in the
8 ordinary course of business?

9 A. Yes.

10 Q. When you say a tractor then it's
11 pulling either the dirty solvent tankers or the
12 clean solvent tankers?

13:57:37

13 A. Yes.

14 Q. Could you identify this page from
15 the ledger?

13:57:47

16 A. K 20185 008 January, February,
17 March 1971, number seven White tractor and that
18 is my handwriting. K 20185 008 and the number
19 seven White tractor, April, May, June 1971.
20 That's my handwriting.

13:58:13

21 Q. Were those entries made in the
22 ordinary course of business?

23 A. Yes.

24 Q. I'm showing you the final sheet
25 from the ledger. Could you identify that

13:58:21

1 please?

2 A. K20185010, number eight Ford
3 tractor. January, February, March 1971.

4 Q. Is there any information on the
5 reverse side of the page?

13:58:37

6 A. Yes. K20185010. Number eight Ford
7 tractor, April, May, June 1971.

8 Q. Were those entries made in your own
9 hand?

10 A. Yes.

13:58:56

11 Q. In the ordinary course of business?

12 A. Yes.

13 Q. Now, I'm showing you for instance a
14 single white sheet of paper. It's
15 approximately legal size in length, about eight
16 and-a-half inches wide. Do you recognize that
17 document?

13:59:19

18 A. Yes.

19 Q. What do you recognize that to be?

20 A. This is truck taxes. And it shows
21 the permit number, which is what I read from
22 the former page. And it shows the miles for
23 which I'm paying the tax, and the tax due. The
24 bill was \$424.97. And it was signed by me.

13:59:28

25 Q. So you used the information

13:59:56

1 contained in the ledgers to prepare this
2 document?

3 A. Yes.

4 Q. And the top of this document has a
5 number. Can you read that into the record
6 please?

14:00:04

7 A. HUT, H U T, number 36520185.

8 Q. You indicated the date, did you see
9 a date?

10 A. 4-7-72.

14:00:21

11 Q. I'm showing you a document which is
12 part of this group Exhibit USEPA 7, similar
13 type of document with a different date. Could
14 you read that date into the record?

15 A. This date is 1-17-72.

14:00:38

16 Q. And again what is this a record of?

17 A. Ohio Highway Use Tax.

18 Q. What role did you have in preparing
19 that document?

20 A. I prepared this document and I
21 signed it.

14:00:50

22 Q. In your capacity as --

23 A. Vice president.

24 Q. When did you become vice president
25 of Obitts Chemical?

14:00:57

1 A. It was early on during the time I
2 worked there. And it was suggested by our
3 accountant that I become an officer of the
4 corporation and I bought stock.

5 Q. Was that before or after you
6 married Mr. Obitts?

14:01:13

7 A. That was before we were married.

8 Q. Now, again, just to make the record
9 complete, I want to show you another one of
10 these tax forms, if you could read the date off
11 of that document?

14:01:22

12 A. 7-10-72.

13 Q. What role did you have in preparing
14 that document?

15 A. I prepared the document. It's the
16 same as the others primarily.

14:01:33

17 Q. What information did you rely on in
18 preparing this tax document?

19 A. The Ohio miles that were traveled
20 by our tractors.

14:01:47

21 Q. Where were those miles recorded?

22 A. On this ledger which showed the
23 milage which I read before this.

24 Q. Again, just to complete this
25 record, I'm showing you another tax copy.

14:01:59

1 Could you read into the record the date of this
2 document?

3 A. 10-16-72.

4 Q. What role did you have in preparing
5 the document?

14:02:10

6 A. I prepared the document. And it
7 was the same as the last one, Ohio Highway Use
8 Tax.

9 Q. Again, what information did you
10 rely on in preparing the document?

14:02:19

11 A. The ledger sheets that I read
12 before these.

13 Q. I'm handing you an additional tax
14 document. What is the date?

15 A. 1-10-73.

14:02:29

16 Q. What role did you have in preparing
17 this document?

18 A. I prepared this document and signed
19 it.

20 Q. What did you rely on, what
21 information did you rely on in preparing it?

14:02:36

22 A. My truck milage ledger.

23 Q. Now, I'm showing you a somewhat
24 smaller sheet of paper that also appears to be
25 an Ohio tax document. Do you recognize that

14:02:47

1 paper?

2 A. Yes.

3 Q. What do you recognize it to be?

4 A. This is a permit from the State of
5 Ohio. It's a highway use permit.

14:03:00

6 Q. Does it indicate whether or not
7 Obitts Chemical took any action in connection
8 with that permit?

9 A. This was a permit that we paid for
10 for the Mack tractor.

14:03:15

11 Q. In what year, if you can tell?

12 A. 1972.

13 Q. And then finally that looks like an
14 informational leaflet, Ohio, Know Your Ohio Use
15 Tax. Is that something you received from the
16 State of Ohio?

14:03:32

17 A. I have to look at it.

18 Q. Yes. Take your time.

19 A. Yes. It's instructions on filing
20 these tax reports.

14:03:55

21 Q. Finally, just a piece of paper that
22 appears to be a blank form for filling out the
23 tax documentation?

24 A. Yes. It's the same as the ones
25 that are filled out, only it's not.

14:04:10

1 MR. KAISER: All of these papers
2 combined, what we're referring to now as USEPA
3 Exhibit 7, I'll just take those off your hands.

4 I will note just for the record
5 there was some confusion. I had handed out 14:04:24
6 documents that I thought would contain the same
7 documents I just reviewed with Mrs. Obitts. I
8 understand that photocopies may or may not have
9 been a complete set of what I just reviewed
10 with Mrs. Obitts. 14:04:40

11 I will leave with the court
12 reporter a complete set of what we've just gone
13 through and referred to as USEPA Exhibit 7.
14 And I'm sure you can arrange to obtain a copy
15 of all the exhibits from the court reporter. 14:04:53

16 Q. Now, Mrs. Obitts, I'd like to show
17 you a ledger book that we're going to mark for
18 purposes of identification as USEPA Exhibit 8.
19 Do you recognize this book?

20 A. Yes. 14:05:23

21 Q. Do recognize that ledger?

22 A. Yes. It's a cash disburse ledger.

23 Q. Is a record of what company?

24 A. Chemical Service Corporation.

25 Q. Were you an officer of Chemical 14:06:05

1 Service Corporation?

2 A. Yes. I was vice president, same as
3 Obitts Chemical Company.

4 Q. Let's just look at the first page.
5 Well, the first page of the ledger is blank and 14:06:18
6 then we open it up to page one and that's
7 indicated in the upper left-hand corner, is it
8 not?

9 A. Yes.

10 Q. Is there a date indicated as to 14:06:27
11 when these records were made?

12 A. September 1970.

13 Q. And the handwriting on that page do
14 you recognize it?

15 A. That's my handwriting. 14:06:37

16 Q. Is it also your handwriting then
17 going across the ledger to the second page?

18 A. Absolutely. Yes.

19 Q. Did you maintain these records in
20 the ordinary course of business? 14:06:46

21 A. Yes, I did.

22 Q. What was the purpose of this ledger
23 book?

24 A. It was our bookkeeping system. My
25 accountant got the ledger at the end of the 14:06:55

1 year to do our income tax and other taxes.

2 Q. I note that interspersed --

3 MR. PANZA: Can I take a look at
4 what the witness is reading?

5 MR. KAISER: No problem.

14:07:09

6 Q. Mrs. Obitts, are you comfortable
7 with him looking over your shoulder?

8 A. I don't mind. Come on.

9 This is my own way of checking out
10 my figures.

14:07:12

11 Q. When you say own way, describe for
12 the record that document you're holding in your
13 hand?

14 A. Okay. I'm going to take my cash
15 disbursed total, and I'm going to add up all
16 these other little entries which show what the
17 cash disbursed was for, and both columns have
18 to total the same. These have to add up to my
19 total cash disbursed. And these were the
20 little -- I just left them in the book.

14:07:20

14:07:40

21 Q. Is that your handwriting on the top
22 of that?

23 A. Yes, it is.

24 Q. That sheet in particular is it
25 dated?

14:07:46

1 A. September 1970.

2 Q. Now I note, what are the columns as
3 you read across the top, what are the possible
4 entries?

5 A. Cash disburse and then taxes
6 withheld, which are FICA and federal income
7 tax, city income tax, gross wages, freight,
8 employee loans, office expenses, operational
9 supplies, material, utilities and phone, repair
10 and maintenance, drums, truck and auto, and
11 other accounts which are written in as rent and
12 a note payable, note payable, two more note
13 payables.

14:07:55

14:08:20

14 Q. I'd like to direct your attention
15 to the column entitled materials. Do you see
16 that column?

14:08:39

17 A. Yes.

18 Q. Within this sheet that is open
19 which is the September 1970, did Obitts
20 Chemical purchase any items that you
21 characterize as materials during that period?

14:08:54

22 A. Yes. From General Tire & Rubber.

23 Q. Who would make the decision about
24 categorizing the expenses and the
25 disbursements? Who would decide which column?

14:09:06

1 A. I set these books up myself.

2 Q. When you noted something in the
3 column headed materials what types of items
4 would you note in that column?

5 A. It might be something that we were 14:09:21
6 using for processing or it might be some
7 material that we bought and sold.

8 Q. Now if it's a material you used for
9 processing what would be an example of that
10 type of material? 14:09:34

11 A. It would be like caustic soda. And
12 I really can't remember the other things we
13 used.

14 Q. Caustic soda would actually be
15 something you would use in the distillation 14:09:46
16 process?

17 A. Yes.

18 Q. You had a second category of
19 materials. Materials you used in process or
20 materials you bought and sold. Did I 14:09:55
21 understand you correctly?

22 A. Occasionally, yes.

23 Q. What types of products would those
24 be that Obitts Chemicals would buy and sell?

25 A. We would occasionally buy in used 14:10:04

1 solvent and reclaim it and resell it.

2 Q. That would be distinct from the
3 service where you would pick up the solvent,
4 distill it, send it back clean to that same
5 customer?

14:10:18

6 A. Yes.

7 Q. In this instance you would buy
8 dirty solvent, distill it and then sell it to a
9 third customer?

10 A. That's correct.

14:10:27

11 Q. Now, on this first page that we're
12 looking at where we have the material purchase,
13 what was the amount of the material purchase?

14 A. \$261.57.

15 Q. Again, from whom did Obitts
16 Chemical purchase that material?

14:10:41

17 A. General Tire.

18 Q. Do you recall what type of material
19 Obitts Chemical purchased from General Tire?

20 A. No. It's not in my book what the
21 material was.

14:10:52

22 Q. Do you have a recollection
23 independent of what is recorded in the book?

24 A. I don't recall.

25 Q. Do you see any other entries on

14:11:01

1 this page where Obitts chemicals purchased
2 materials?

3 A. Yes.

4 Q. What line?

5 A. General Tire & Rubber.

14:11:12

6 Q. All right. Again, do you know
7 whether General Tire & Rubber ever provided
8 caustic soda to Obitts?

9 A. No, they didn't.

10 Q. They did not. So it wasn't caustic
11 soda that we were providing?

14:11:24

12 A. No.

13 Q. Do you know whether General Tire
14 ever provided Obitts Chemicals with any other
15 process materials, that is materials Obitts
16 Chemical needed to purchase in order to run the
17 distillation process?

14:11:34

18 A. We bought calcium chloride. I
19 don't really remember other things that we
20 bought.

14:11:53

21 Q. Would you have purchased calcium
22 chloride from General Tire & Rubber?

23 A. No.

24 Q. What type of materials did Obitts
25 Chemical more commonly purchase from General

14:12:00

1 Tire & Rubber?

2 A. It seems to me as though it would
3 have to be a material that we reclaimed and
4 resold.

5 Q. What's the basis for your opinion
6 that it's more likely than not Obitts Chemical
7 purchased from General Tire a material that it
8 reclaimed and then sold?

14:12:10

9 A. Because we didn't send it back to
10 them.

14:12:25

11 Q. How do you know that?

12 A. From memory. We did not send this
13 back to them. It wouldn't be in the material
14 column as something we bought. This is a cash
15 disburse book. We paid them for this. So it
16 was not sent back to them.

14:12:34

17 Q. Now, if you open to the next page
18 of the ledger in the upper left-hand corner
19 what page number is there?

20 A. Page two.

14:12:51

21 Q. What time period are we looking at?

22 A. It's the same, it's a continuation
23 of the first one.

24 Q. Can you determine whether Obitts
25 Chemicals purchased any other materials during

14:13:02

1 that time period?

2 A. No.

3 Q. They did not?

4 A. No.

5 Q. If you could open to the third

14:13:07

6 page. Do you see any material purchases

7 indicated on the third page?

8 A. Yes. We bought something from

9 Ashland Chemical and it might have been

10 something we used in processing. It was a

14:13:24

11 small amount of money 53.44.

12 Q. Why do you say it might have been

13 something Obitts Chemical used in processing?

14 A. Because we if we purchased solvents

15 it would be a lot more money. And the next

14:13:40

16 line is General Tire & Rubber.

17 Q. What was the amount of the purchase

18 from General Tire & Rubber?

19 A. \$518.78.

20 Q. And based on the amount of money of

14:13:52

21 that purchase and the identity of the company

22 from whom Obitts made the purchase, do you have

23 an opinion as to whether Obitts was purchasing

24 processed materials or materials to be

25 reclaimed and sold?

14:14:06

1 A. This would have to be material
2 reclaimed and sold.

3 Q. When you say this are you referring
4 to the transaction with General Tire & Rubber?

5 A. Yes, I am, because we paid them
6 money for this material.

14:14:16

7 Q. Are there any other material
8 purchases indicated on page three?

9 A. No.

10 Q. On page four, do you see whether
11 there are any material purchases?

14:14:30

12 A. Casper Foundry, I do not recall
13 what that was about.

14 Q. What was the amount of the purchase
15 from Casper?

14:14:41

16 A. \$132.

17 Q. Are there any other material
18 purchases?

19 A. Let's see, Union Carbide that might
20 have been caustic, \$75.25. And Industrial
21 Alkali that was caustic, 127.20. There's no
22 material that we processed on that page.

14:14:54

23 Q. If you could turn and look at the
24 ledger on page five?

25 A. There's no material purchased on

14:15:21

1 page five.

2 Q. If you could review page six for us
3 please?

4 A. Page six. There's \$50, Carmac,
5 that would have been for something that we were 14:15:34
6 using in the plant. It's not material
7 purchased and resold.

8 Q. Page seven please?

9 A. There's no material purchased.
10 Page eight there's no material purchased. Page 14:15:55
11 nine there's none purchased. Page ten there's
12 none purchased.

13 You want me to keep going?

14 Q. Yes, if you would, please.

15 A. Page 11 there's \$45 for Duplex 14:16:13
16 Manufacturing & Foundry. That would have been
17 something we used in processing in our plant
18 for some reason.

19 Page 12 General Tire & Rubber.

20 Q. What was the amount of the purchase 14:16:48
21 from General Tire & Rubber?

22 A. \$420.87.

23 Q. What was the time frame of that
24 purchase?

25 A. July, I can give you the date. 14:16:58

1 July 19th, 1971.

2 Q. And based on the amount of the
3 purchase and the identity of the person from
4 whom Obitts Chemical made the purchase, do you
5 have an opinion as to whether --

14:17:17

6 A. I'm sure this was material
7 purchased and reclaimed and resold.

8 We'll go to page 13 in August.
9 General Tire & Rubber in August \$375.48.

10 Q. That's August of what year?

14:17:41

11 A. 1971.

12 Q. Again, do you have an opinion as to
13 whether that was process material or material
14 purchased for resale?

15 A. Material purchased for resale.

14:17:53

16 See, I don't remember everything
17 about this either. If I hadn't read it I
18 wouldn't really know. Quote figures that
19 close. Chemical Distributors Incorporated for
20 material, \$260.80. And I don't know what it
21 was.

14:18:30

22 Q. Okay. Fair enough.

23 Are we on page --

24 A. We're on another year. We're on
25 page one.

14:18:54

1 Q. So page 13 was the last entry in
2 August of 1971?

3 A. Yes.

4 Q. Do you recall --

5 A. That was the end of our year.

14:19:00

6 Q. Right. What fiscal year did you
7 operate on at Obitts Chemical?

8 A. The end of August was the end of
9 our fiscal year.

10 Q. Was that the same for Chemical
11 Services?

14:19:11

12 A. Yes. And so this starts page one
13 in September of 1971.

14 Q. Do you see any material purchases
15 in September of 1971?

14:19:21

16 A. Yes, 428.85. General Tire &
17 Rubber.

18 Q. Again, do you have an opinion as to
19 whether or not that was the purchase of?

20 A. I believe it was a purchase of
21 material. It was bought and sold. October
22 1971, Union Carbide corporation \$373.17, is
23 listed in the material column.

14:19:34

24 Q. Do you recall what that was
25 purchased for?

14:20:05

1 A. I don't recall.

2 Q. Do not recall?

3 A. I don't recall. Nothing in

4 November.

5 MR. PANZA: Would you go by the

14:20:19

6 pages?

7 A. Page three.

8 MR. PANZA: Nothing on page three?

9 Was Union Carbide on page two?

10 THE WITNESS: Yes.

14:20:29

11 MR. PANZA: Thank you. I

12 apologize.

13 A. Page four, General Tire & Rubber,

14 \$432.

15 Q. What month was that purchase?

14:20:45

16 A. December 1971.

17 Q. Do you have an opinion as to

18 whether the material purchased from General

19 Tire & Rubber was for processing or for

20 reclamation and resell?

14:20:55

21 A. I believe it was for reclamation

22 and resale. January 1972. We have General

23 Tire in January 1972, 392.50.

24 Q. Again, do you have an opinion as to

25 whether that was process material or material

14:21:25

1 for resale?

2 A. I believe that was material for
3 resale.

4 Q. What page are you reviewing now?

5 A. I'm on page six. It was General
6 Tire & Rubber, 439.30.

14:21:40

7 Q. Do you have an opinion that was
8 processed material or material for resale?

9 A. I believe it was material for
10 resale, 49.50. Shumar Paint & Sandblasting,
11 49.50, that was probably paint.

14:21:57

12 March 1972, General Tire & Rubber,
13 \$818.10.

14 Q. Do you have an opinion as to
15 whether that purchase was for material, for
16 process material or material to be reclaimed
17 and resold?

14:22:36

18 A. I have an opinion that it was to be
19 reclaimed and resold. However, I don't have
20 the invoices here to show on any of these.

14:22:48

21 Q. When you were vice president and
22 maintaining the books did you routinely keep
23 the invoices?

24 A. Yes.

25 Q. When you sold Obitts Chemical and

14:23:01

1 Chemical Services to Chemical Recovery Systems,
2 do you know who kept control of the records?

3 A. I did.

4 Q. You did?

5 A. Yes.

14:23:15

6 Q. Did you ever release the records to
7 the purchaser?

8 A. The records of where the material
9 came from, no.

10 Q. Or any of the business records?

14:23:25

11 A. No.

12 Q. Of Obitts?

13 A. No.

14 Q. Do you have any more business
15 records of Obitts Chemical anywhere?

14:23:31

16 A. Not to my knowledge.

17 Q. What page are we on in the ledger?

18 A. I think we just did page eight.

19 Page nine, there's no material. Page 10,
20 there's no material. Page 11, which would be

14:24:05

21 June 1972, there's 52.42 from Union Carbide.

22 That would be some material we used.

23 Page 12, July '72, there's no
24 material. Page 13, there's no material.

25 Q. Again, interspersed I see some of

14:24:57

1 these adding machine tickets. This one saying
2 August 1972, who prepared that?

3 A. I did. They should be on every
4 page.

5 Q. And those were your efforts to
6 reconcile the books on a monthly basis?

14:25:10

7 A. Right.

8 Q. And that's your handwriting at the
9 top of that?

10 A. Yes, it is.

14:25:18

11 Page 13 there's no material and
12 that was August 1972. September 1972 and this
13 is page 14, there's no material. I've dropped
14 the material column. There isn't any.

15 Q. Do you recall why you dropped the
16 material column?

14:25:51

17 A. Apparently because we didn't buy
18 any. Page 15 October 1972, I have a material
19 column. Line 15 is General Tire & Rubber,
20 299.85.

14:26:17

21 I have a 52.68, which is Union
22 Carbide. That would be the material for use in
23 the plant.

24 Q. The Union Carbide material?

25 A. Yes. It would probably be caustic

14:26:29

1 soda. I'm not sure, but I would guess it was
2 caustic soda.

3 Q. Again, not having the benefit of
4 having the invoices from General Tire?

5 A. Or calcium chloride. Page 16
6 November '72, \$25 of material. Line 17,
7 Crowborough Laboratories, I don't know what
8 that was for. Probably lab material.

9 Mr. Obitts did check all of the
10 material that came into our yard in the lab.
11 He did a lab distillation of materials that
12 came in.

13 Q. Every time?

14 A. Yes. He didn't want to be
15 surprised by finding something in there that he
16 wasn't told was in there.

17 Q. What would be the consequence if a
18 customer provided something?

19 A. Well, you might have trouble in
20 your distillation and you might have trouble
21 getting a customer something they don't want.

22 January 1973, there's material.
23 This is General Tire & Rubber, page 17.

24 Q. What was the amount of the
25 purchase?

14:26:42

14:27:11

14:27:26

14:27:41

14:28:09

1 A. 594.45.

2 March 1973, page 18, line four,
3 General Tire, 394.95. And General Tire 426.50
4 later in the month.

5 Q. Do you recall offhand where that
6 General Tire facility was located?

14:28:44

7 A. I don't recall, no.

8 April 1973, page 19, General Tire,
9 \$710.80. There's nothing on page 21. Page 22
10 is August '73. There's nothing in there in
11 material. That's the end of that.

14:29:27

12 Okay. September 1973 this is
13 another page one. There's no material there.
14 Page two, there's no material there. That's
15 the end.

14:30:05

16 Q. The end of this ledger?

17 A. Yes.

18 Q. What month and year does it end?

19 A. This is January 1974.

20 Q. All of this that you've reviewed,
21 correct me if I'm wrong, it's all in your own
22 hand with the exception of a few small typed
23 entries, is it not?

14:30:16

24 A. Uh-huh. Except in January 1974
25 there is another handwriting that starts on the

14:30:30

1 third. I did one and two. I did the first
2 three entries in this book. And on January
3 3rd, 1974 someone else started entries on
4 January 3rd. And that is not my handwriting
5 and this is not my handwriting.

14:30:53

6 Q. To the end of the book then is not
7 your handwriting, but the entries up through --

8 A. Through January 2nd are my
9 handwriting.

10 Q. Of 1974?

14:31:04

11 A. Yes.

12 Q. And all of those entries did you
13 make those in the ordinary course of business?

14 A. Yes, I did.

15 Q. And that was your principal and
16 primary cash disbursement ledger?

14:31:12

17 A. Yes, it is.

18 Q. All right. Thank you very much.

19 Now, Mrs. Obitts, I know that
20 required a great deal of effort on your part to
21 go through that page by page. And we
22 appreciate it. You've been going almost an
23 hour now in this afternoon session.

14:31:29

24 Would you like to take a break at
25 this time for 15 minutes and come back, or do

14:31:41

1 you want to plow ahead?

2 A. We can go ahead as far as I'm
3 concerned.

4 Q. All right. I'm going to show you
5 again some ledger pages that I'm going to mark 14:31:57
6 for purposes of identification as EPA's Exhibit
7 9. I'm going to ask you to take a look at
8 these documents and tell me if you recognize
9 them. And if you recognize them tell me what
10 you recognize them to be. 14:32:20

11 MR. KAISER: And ladies and
12 gentlemen, the documents Mrs. Obitts is looking
13 at is the one I gave you, but on the off chance
14 there may be a casual relationship I'm
15 distributing them. 14:32:43

16 A. This is accounts payable.

17 Q. For which company is this the
18 accounts payable register?

19 A. This is for Chemical Service
20 Corporation. 14:33:54

21 Q. That was Chemical Service
22 Corporation?

23 A. Yes.

24 Q. And that's an accounts payable
25 ledger? 14:34:00

1 A. Yes.

2 Q. For what time period?

3 A. 1968 is the first page in here.

4 And some of this is in handwriting of our
5 accountant, because he audited the books and
6 there are accounts receivable in the back of
7 the book.

14:34:17

8 Q. And the accounts receivable in the
9 back of the book, are those accounts receivable
10 for Obitts or for Chemical Services?

14:34:34

11 A. For Chemical Service Corporation.

12 Q. Within that accounts receivable
13 section are you able to identify any customers
14 of Chemical Services?

15 A. In accounts receivable. Yeah. RO
16 Hall Company.

14:34:54

17 Q. Now, if we could just try here to
18 maybe identify a document or the time frame.
19 Where does the accounts receivable begin? I
20 know in front of you you have a page that
21 appears to be March of 1969.

14:35:09

22 Can you tell us where amongst those
23 ledgers the accounts receivable section begins?

24 A. This is inventory here. And this
25 is my accountant's figures.

14:35:26

1 Q. When you say inventory what do you
2 mean by inventory?

3 A. As of August 31st, 1968 this is an
4 inventory of what was on hand.

5 Q. What types of information is
6 contained in the inventory ledger that you're
7 looking at? And just again to try to make this
8 clear, it's a one-page document, the center top
9 says inventory, August 31st, 1968, and then it
10 begins with an entry that's 7-13-65. But then
11 below that again in the middle of the page,
12 inventory, August 31st, 1969. So if it helps.

14:35:41

14:35:59

13 All right, Mrs. Obitts, I'm sorry
14 to grab the documents from you here. You were
15 about to tell us what information is contained
16 on this inventory record indicating inventory
17 on August 31st, 1969?

14:36:31

18 A. Okay. On that date 1969 we had
19 Astlett Balata material. General Tire hexane,
20 that was the finished material. That means it
21 was already processed.

14:36:52

22 Dow, methylene chloride. Dow,
23 trichloroethylene, caustic soda. A mix solvent
24 from Obitts, chloride cans, empty drums, used
25 drums and Dryrite.

14:37:20

1 Q. Does it indicate volumes of those
2 chemicals?

3 A. Yes. Astlett Balata was 44 drums.
4 General Tire & Rubber was 4,500 gallons
5 finished, that means already processed. Dow, 14:37:34
6 methylene chloride 220 gallons. Dow,
7 trichloroethylene 11,220 pounds. That's not
8 gallons on that one.

9 Caustic soda one drum. Obitts mix
10 solvent four drums. Chloride cans 60. Empty 14:37:56
11 drums six drums. Used empty drums, 35 drums.
12 Dryrite one drum.

13 Q. What was the purpose of performing
14 that inventory at the end of the year?

15 A. This was done at the end of August, 14:38:24
16 which was when we had our books done. And I
17 had to give this to my accountant.

18 Q. All right. So that indicates the
19 inventory, the closing inventory for August
20 31st, 1969? 14:38:39

21 A. Yes.

22 Q. Is there anything more on the back
23 of the page? No. The back is empty?

24 A. No. Some of these other pages are
25 my accountant's figures. 14:38:50

1 Q. What about this next page?

2 A. This is 1967.

3 Q. That's also an inventory at the end
4 of August '67?

5 A. Yes.

14:39:00

6 Q. Is that in your handwriting?

7 A. Yes.

8 Q. Did you make those --

9 A. I did this.

10 Q. -- entries in the ordinary course
11 of business?

14:39:05

12 A. Yes, I did.

13 Q. What was the purpose of performing
14 that end of the year inventory?

15 A. It was for my accountant, he
16 requested it.

14:39:11

17 Q. What does that document indicate
18 was in inventory at the close of business in
19 August 19 --

20 A. What does it indicate the
21 materials?

14:39:26

22 Q. Yes. What companies?

23 A. Harchem methanol raw, 5,200
24 gallons. Harshaw Chemical 30 drums. Chemical
25 Distributors, 4,000 gallon. Harchem 5,152

14:39:37

1 gallons. Astlett Balata, which was hexane and
2 alcohol, 44 drums. Harshaw Chemical, methanol,
3 20 drums and 62 drums.

4 Firestone. I think that's one we
5 haven't mentioned, Firestone.

14:40:02

6 Q. That may be.

7 A. Firestone, hexane, 3,061 gallons.
8 General Tire 8,282 gallons. That was material
9 on hand August 31st, 1967.

10 Q. Now Firestone, having just read
11 that entry in the Chemical Services inventory
12 log, does that refresh your recollection as to
13 whether Firestone was a customer of Chemical
14 Services?

14:40:20

15 A. Yes, they were. Uh-huh.

14:40:34

16 Q. All right. And again I'm relying
17 on you to in effect decipher these logs. What
18 other information do you see in there.

19 Now you're looking at a page,
20 what's the top of the page?

14:40:51

21 A. Inventory. These are pages done by
22 my accountant and they're adjusting journal
23 entries.

24 Q. When do you see the next entries
25 that are made in your hand?

14:41:07

1 A. These are for every year. Well,
2 I've got a thing here that says cash in the
3 bank. I don't think that's going to help.

4 Q. No. What we're looking for, what
5 the government's interested in is any entries
6 that would indicate the identity of customers
7 of Chemical Services during the time period
8 that these ledgers were maintained?

14:41:43

9 A. I have accounts receivable for
10 Chemical Service Corporation.

14:41:59

11 Q. Is there a time frame indicated?

12 A. 1967. September.

13 Q. And I note that those are typed in
14 entries?

15 A. Yeah.

14:42:13

16 Q. Do you know who?

17 A. I did that once in a while.

18 Q. You did that?

19 A. Uh-huh. Then I got tired of
20 putting them out of the book and then I'd go
21 back to hand writing. So that's why it was
22 like that.

14:42:20

23 Q. At that point in time you were
24 entering the information with the typewriter?

25 A. Yes.

14:42:29

1 Q. Were you making those entries in
2 the ordinary course of business?

3 A. Yes.

4 Q. What information is contained on
5 the page that you're looking at?

14:42:37

6 A. Accounts receivable. September.
7 RO Hall and Chemical Distributors,
8 Incorporated.

9 Q. RO Hall, who is that? Where are
10 they located?

14:42:48

11 A. I don't recall.

12 Q. Do you recall what sort of services
13 Chemical Service performed for RO Hall?

14 A. No. It would have been some sort
15 of processing, but I don't recall it.

14:42:57

16 Q. Who was the other?

17 A. Chemical Distributors,
18 Incorporated. They had an invoice of
19 \$1,493.52. But I don't recall a lot about them
20 either.

14:43:16

21 Q. Do you recall what services
22 Chemical Services performed for that company?

23 A. It would have been processing of
24 some material.

25 Q. And is there any way by looking at

14:43:34

1 the amount of the invoice that you can estimate
2 the amount of material Chemical Services
3 processed?

4 A. I don't know how much material it
5 was. No. 14:43:45

6 Q. But those were the customers of
7 Chemical Services during what time frame?

8 A. 1967.

9 Q. And what other time frames are
10 indicated in the ledger? 14:43:59

11 A. This is 1967, '68, accounts
12 receivable. And '67, '68. It's all accounts
13 receivable.

14 Q. Without going through those line by
15 line you're reviewing them line by line, but 14:44:17
16 without testifying about each line, is it fair
17 to say that you made those entries in the
18 ordinary course of business?

19 A. Yes, I did.

20 Q. And what would you tell the group 14:44:28
21 here this afternoon, what was the purpose of
22 making those entries in the ledger?

23 A. Accounts receivable was money owed
24 us by our customers. And this is a record of
25 what we invoice them. That was only in 14:44:43

1 Chemical Service Corporation.

2 Q. If someone is listed amongst the
3 accounts receivable, they were a customer of
4 Chemical Services during that time frame?

5 A. Yes, they were.

14:44:56

6 Q. And the amount of money they owed
7 is the amount to the best of your ability to
8 determine was owed for services rendered?

9 A. That's right.

10 Q. And the service that Chemical
11 Services offered during that time period, how
12 would you describe those services?

14:45:07

13 A. The services offered to the
14 customer?

15 Q. Yes.

14:45:14

16 A. We would pick up the material,
17 reclaim it and return it.

18 Q. What length of time do you have
19 there on the accounts receivable?

20 A. I'm up to 1970. These are back to
21 '65.

14:45:25

22 Q. So some of those pages are out of
23 order?

24 A. They're out of order. That's '66.
25 These are out of order. I can tell right here

14:45:41

1 my handwriting when I did totals, cash
2 received, accounts receivable, so forth, that's
3 my handwriting.

4 Q. For instance on that page it's a
5 cash received 1970, at the top there are typed 14:45:58
6 entries beginning in the company column,
7 January 6, who's that first entry on January 6?

8 A. Rogate Industries Incorporated.

9 Q. Were they a customer of Chemical
10 Services? 14:46:15

11 A. Yes, they were.

12 Q. And then you're indicating that the
13 handwritten entries down at lines 9, 10 and 11,
14 those are your handwriting?

15 A. Yes, they are. 14:46:24

16 Q. What was the purpose of those
17 handwritten entries?

18 A. It was my totals. I have a total
19 of cash received for the month, accounts
20 receivable and the loan broken down. 14:46:34

21 Q. Did you make those entries in the
22 ordinary course of business?

23 A. Yes, I did.

24 Q. And you maintained these records in
25 the ordinary course of business? 14:46:42

1 A. Yes, I did. These are cash
2 received. This is 1970 cash received, '69 cash
3 received, '68, we're going backward here, '68
4 cash received.

5 Q. Again does that indicate that
6 company from whom Chemical Services received
7 the cash?

14:47:08

8 A. The customers.

9 Q. I'm sorry?

10 A. They were customers. Principally,
11 '67.

14:47:17

12 Q. Can you read the identity of some
13 of those customers back in the time frame
14 you're now looking at?

15 A. Ashland Oil & Refinery. Obitts
16 Chemical Company.

14:47:37

17 Q. Why would there be an entry for
18 Obitts Chemical Company in the Chemical
19 Service's ledger?

20 A. This is a cash received and it
21 means Obitts Chemical paid Chemical Service for
22 something. And it would be, occasionally they
23 would process something for Obitts Chemical
24 that was material that belonged to Obitts
25 Chemical. And they would be, Obitts Chemical

14:47:52

14:48:05

1 would be billed for their processing.

2 Q. And a check would go then from
3 Obitts to Chemical Service?

4 A. It came from Chemical Service to
5 Obitts Chemical Company. Yes. It was keeping 14:48:14
6 things straight always between the two
7 companies. There's RO Hall, Cuyahoga Chemical,
8 Miracle Adhesive.

9 Q. Miracle Adhesives, I don't know
10 that that's a name we've heard of today.

11 A. I don't believe.

12 Q. Were they a customer of --

13 A. Chemical Service Corp.

14 Q. What's the amount of invoice or
15 receivable? 14:48:45

16 A. \$756. Astlett Balata. Some of
17 these are repeat.

18 Q. So you're still looking through
19 that ledger and what year are you in now?

20 A. It's going backwards in the year 14:49:12
21 '66. And this is all cash received.

22 Q. Again, are those entries you made?

23 A. Yes, they are.

24 Q. In the ordinary course of business?

25 A. Yes, they are. Okay. Then I have 14:49:23

1 a category here of employers FICA, which I
2 don't think would be of any interest.

3 Q. I would agree with you. How many
4 pages of FICA entries do you have there?

5 A. These are broken down categories. 14:49:53
6 Electric. Just that. Electric, repair and
7 maintenance. This is material. But it doesn't
8 say it's a breakdown for the whole year. But
9 it doesn't say who it's from.

10 Q. That would be material purchased by 14:50:15
11 Chemical Services?

12 A. Yes. I wrote these in here. They
13 are journal entries by my accountant.

14 Q. But it doesn't identify the company
15 from whom Chemical Service purchased? 14:50:32

16 A. No. These are breakdowns of my
17 categories from my ledger, like operational
18 supplies, office supplies, freight, gross
19 wages, accounts receivable on sales.

20 This is my accountant's writing. 14:50:54
21 It's profit and loss from my accountant,
22 federal income tax. These are not relative to
23 what we're doing here right now.

24 Q. Right. They don't identify
25 customers? 14:51:10

1 A. FICA. First National Bank. That's
2 it.

3 Q. Very good. Thank you.

4 Is there anything else in these
5 sheets that you'd set aside to your right?

14:51:23

6 It's still the same exhibit. We're
7 still in EPA 9.

8 A. This is accounts payable 1968.

9 Is this of any interest?

10 Q. No. Any accounts receivable or
11 account inventory forms that we haven't
12 reviewed?

14:51:50

13 A. Accounts payable and inventory.
14 And that's all.

15 Q. Have you previously reviewed,
16 correct me if I'm wrong, we looked at those
17 inventory sheets earlier, had we not?

14:52:08

18 A. Yes.

19 Q. Very good.

20 MR. NASH: In accounts payable you
21 have material to Ashland?

14:52:22

22 THE WITNESS: That's what we paid
23 them.

24 MR. KAISER: Let's get this on the
25 record.

14:52:29

1 Q. What are you looking at there, Mrs.
2 Obitts, which section of the ledger?

3 A. This is accounts payable in 1966.

4 Q. Are there any material columns
5 there that you kept track of?

14:52:41

6 A. Yes. Ashland Oil 1,169.10.
7 Material, General Tire, 273.40. And Firestone
8 Rubber & Latex, \$87.

9 Q. Now of those materials you just
10 identified, those were materials purchased by
11 which company?

14:53:07

12 A. This is all Chemical Service
13 Corporation. I don't have Obitts Chemical's
14 books.

15 Q. Do you have any way of knowing what
16 types of materials Chemical Services purchased,
17 did they also purchase the process materials
18 and the reclaim material?

14:53:15

19 A. This would be from Ashland Oil,
20 would be something, some material that had to
21 be redone and resold. And there's one from
22 General Tire which is a small amount for
23 273.40.

14:53:30

24 Firestone Rubber is probably
25 something we bought from running our materials.

14:53:52

1 It's only \$87. I don't recall ever making a
2 small purchase like that when buying used
3 solvents.

4 MR. KAISER: Very good. Thank you
5 very much, Mrs. Obitts.

14:54:07

6 I think that concludes the
7 examination with respect to Exhibit 9.
8 Off the record.

9 (Discussion off the record.)

10 MR. PANZA: It is 10 of three. I
11 just presume that we are going to be allowed to
12 call the witness back at some particular point
13 in time so everybody could have the opportunity
14 of getting all the exhibits in order and
15 comparing them to the witness's testimony, so
16 that we may ask a reasonable inquiry of the
17 witness?

14:54:35

14:54:47

18 MR. KAISER: Absolutely. That was
19 the agreement that we made earlier. And just
20 to the extent we're confirming that on the
21 record, that's fine.

14:54:57

22 MR. PANZA: Thank you, Steve.

23 (Recess had.)

24 Q. All right, Mrs. Obitts, we're again
25 resuming your deposition this afternoon. It's

15:12:22

1 about eight minutes past three.

2 I'm going to show you again a bound
3 ledger book and I'm going to ask you to take a
4 minute, tell me if you recognize that.

5 A. Accounts payable.

15:12:40

6 Q. For which company?

7 A. Cash received. This is for
8 Chemical Service Corporation.

9 Q. And just for the record, I'm going
10 to be marking this document as EPA Exhibit 10.

15:12:53

11 Again what information or what type
12 of ledger is this EPA's Exhibit 10?

13 A. Well, the first page is an accounts
14 payable. But it's the next page is our cash
15 received.

15:13:22

16 Q. Cash received?

17 A. Yeah. There's only one accounts
18 payable.

19 Q. For Chemical Service?

20 A. Yes.

15:13:23

21 Q. What time frame are we in here?

22 A. January 1971.

23 Q. Are you able to determine by
24 reference to this document the identity of
25 customers of Chemical Services in January 1971?

15:13:34

1 A. Yes.

2 Q. How were you able to determine the
3 identity of Chemical Service customers?

4 A. I have a list of customers on cash
5 received, and it tells the amount of money 15:13:52
6 received and what was invoiced, which is the
7 same. And these were customers of Chemical
8 Service Corporation. These were not customers
9 that Obitts Chemical did work for.

10 MR. MILLICAN: I'm sorry to 15:14:11
11 interrupt you. Accounts payable is the first
12 page. The second page was what?

13 THE WITNESS: I'm on cash received.
14 There's only one page here. This is accounts
15 payable. And then it goes to the next page to 15:14:24
16 cash received, 1971.

17 MR. MILLICAN: What's the date on
18 the accounts payable?

19 THE WITNESS: The accounts payable
20 sheet is August 31st, 1971. 15:14:38

21 MR. MILLICAN: Thank you. I'm
22 sorry to interrupt.

23 MR. KAISER: That's all right. To
24 the extent it clarifies the record I'll be more
25 than happy to have your suggestions. So don't 15:14:51

1 hesitate.

2 Q. Now, what's at the top of the page
3 you're looking at, Mrs. Obitts?

4 A. This is cash received 1971, January
5 it starts. 15:15:06

6 Q. Without going over, give us an
7 example there of the January, who's in that
8 first section, what are the names of the
9 customers?

10 A. Sylvania Electric Products, RO Hall 15:15:16
11 & Company, Wooster Iron & Metal. And,
12 incidentally, Wooster Iron & Metal purchased
13 material to the amount of \$989.

14 Q. What does that mean that they
15 purchased material as opposed to -- 15:15:35

16 A. It was apparently something that we
17 bought reclaimed and resold.

18 Q. And sold it to whom?

19 A. To Wooster Iron & Metal.

20 Q. Did Wooster Iron & Metal also send 15:15:45
21 materials to Chemical Services for recovery?

22 A. Not to my knowledge. I don't
23 recall that they did.

24 Q. How about those other companies, RO
25 Hall, was that a recovery service? 15:15:57

1 A. Yeah. That was reclaimed material,
2 we reclaimed something for them.

3 Q. And Sylvania Electric?

4 A. That was something we reclaimed,
5 but this one entry is under material. 15:16:09

6 Q. So where it's indicated in the
7 column other, that suggests or that tells you
8 that you sold product to them?

9 A. That's correct.

10 Q. And if it was a service that you 15:16:23
11 performed for the company where did you record
12 that?

13 A. It would be just under received and
14 invoiced.

15 Q. Do you know who made those entries 15:16:34
16 into the ledger?

17 A. I made these entries.

18 Q. Did you make them in the ordinary
19 course of business?

20 A. Yes, I did. Obitts Chemical 15:16:42
21 Company, that would mean that Chemical Service
22 processed something for Obitts Chemical
23 Company, and Obitts Chemical Company paid them
24 \$1,272.78.

25 Q. All right. 15:17:03

1 A. Now Chemical Recovery could not
2 process everything that Obitts Chemical could
3 process. But there are some things that both
4 companies could process. And this could have
5 meant that they had an order they need to get
6 out, so they farmed it out to Chemical Service
7 to do it.

15:17:18

8 That's the only reason I can think
9 of that they would have done that. February
10 there's Sylvania electric. Miracle Adhesives,
11 and Miracle Adhesives purchase material from
12 Chemical Service Corporation in the amount of
13 1,073.73.

15:17:37

14 RO Hall, that was reclaiming.
15 Ideal Filter, Larson Steel Castings, Sylvania
16 Electric and RO Hall. Those are March.

15:17:59

17 Q. And those are all reclaiming
18 services?

19 A. Yes. April is Larson Steel
20 Castings, RO Hall, RW Obitts, RO Hall again and
21 Sylvania Electric. That was April.

15:18:15

22 May there was just one.

23 Q. Just for the record, you have now
24 turned the page. And you are on the page on
25 the left-hand side of the ledger book begins

15:18:38

1 with an entry of May 12, 1971, and on the
2 right-hand side of the ledger has an entry
3 September 1st, 1971?

4 A. Yes.

5 Q. Again who made those entries?

15:18:51

6 A. I did.

7 Q. What is recorded in those entries?

8 A. These are cash received and what
9 they were invoiced.

10 Q. Does that identify again customers
11 of Chemical Services for the time period?

15:19:00

12 A. Yes.

13 Q. Who made those entries?

14 A. I made these entries.

15 Q. In the ordinary course of business?

15:19:10

16 A. Yes.

17 Q. Now, if we could turn the ledger
18 page of the left side. It's a cash received
19 1972 with the first entry January 3rd. And on
20 the right side it's cash received 1972 with an
21 initial entry of April 6. On those two pages,
22 Mrs. Obitts, who made those entries?

15:19:22

23 A. I made these entries.

24 Q. Did you make them in the ordinary
25 course of business?

15:19:36

1 A. Yes, I did.

2 Q. I see there are some handwritten
3 entries on both the left-hand and right-hand
4 side of the ledger. Do you recognize that
5 handwriting?

15:19:44

6 A. These are my handwriting. These
7 are totals of each month on the handwritten
8 entries.

9 Q. And again, are those all entries
10 indicating recovery services performed by
11 Chemical Services?

15:19:57

12 A. Yes.

13 Q. For the customers identified?

14 A. Yes.

15 Q. If we could look at the next page,
16 please. The next page has a single entry of
17 September 1st. And on the right-hand side is a
18 cash received 1972 with a first entry of
19 September 1st going down to the bottom of the
20 page with an entry of February 22nd.

15:20:05

15:20:24

21 Again, what's recorded on those
22 pages, Mrs. Obitts?

23 A. This is cash received and cash
24 invoiced and my total is for each month.

25 Q. And again, identifying customers

15:20:38

1 who used Chemical Services for recycling
2 services?

3 A. Yes.

4 Q. The next page is cash received
5 1973. The first entry May 5th at the top of
6 the page on the left-hand side. On the
7 right-hand side of the ledger accounts received
8 1971 with the first entry January 4th.

15:20:48

9 What again is indicated on those
10 pages, Mrs. Obitts?

15:21:04

11 A. The monthly totals is under each
12 month.

13 Q. You made those entries?

14 A. Yes, I did.

15 Q. You maintain these records as well
16 in the ordinary course of business?

15:21:11

17 A. Yes, I did.

18 Q. And again, all recovery services,
19 there are no material purchases or sales?

20 A. No.

15:21:20

21 The next page is an accounts
22 receivable 1971. You want me to read any of
23 this?

24 Q. No. That's okay. You prepared
25 that page accounts receivable 1971?

15:21:37

1 A. Yes.

2 Q. If we could turn to the next page?

3 A. It's accounts receivable more of
4 1971.

5 Q. With an entry at the top of the
6 page May 24th, the bottom entry being August
7 25th, and then on the right-hand side again
8 accounts receivable 1971, first entry September
9 3rd, last entry November 30th, is that correct?

15:21:47

10 A. Yes.

15:22:02

11 Q. Did you make those entries?

12 A. Yes, I did.

13 Q. Now, you've turned the page and
14 we're looking at an accounts receivable on the
15 first entry on the left-hand side of December
16 2nd?

15:22:14

17 A. Right.

18 Q. Are you able to determine the year?

19 A. 1972. Well, it's actually December
20 of 1971 and starting January of 1972.

15:22:23

21 Q. All right. And you indicated you
22 typed in accounts receivable 1972 about a third
23 of the way down from the top of the page on the
24 left-hand side?

25 A. Yes.

15:22:39

1 Q. And on the right-hand side,
2 accounts receivable 1972, what information is
3 contained on that page with an initial ledger
4 entry of March 13?

5 A. This is accounts receivable. 15:22:50
6 That's what we invoiced.

7 Q. Again, were those customers of
8 Chemical Services?

9 A. Yes.

10 Q. If we could take a look at the next 15:22:58
11 page. The next page is again accounts
12 receivable. July 9th is the first entry on the
13 left-hand side, accounts receivable 1972, the
14 first entry on the right side being September
15 12. 15:23:14

16 Again, Mrs. Obitts, what's shown on
17 those two pages?

18 A. Accounts receivable. And I did
19 this.

20 Q. All in the ordinary course of 15:23:21
21 business?

22 A. Yes. Then we start down here in
23 1973.

24 Q. All right. At the bottom of the
25 page? 15:23:29

1 A. Yes.

2 Q. We begin for Chemical Services,
3 accounts receivable, January 16, 1973. Is that
4 your handwritten notation at the bottom of the
5 page?

15:23:44

6 A. Yes.

7 Q. And again this is accounts
8 receivable. Having turned the page, it's
9 AC/REC, period, 1973 at the top of the page,
10 with the first entry of February 5th. And on
11 the right-hand side of the page AC/is that P A
12 Y?

15:23:58

13 A. It's accounts payable. August
14 31st, 1973.

15 Q. So the information on the left side
16 of the ledger is accounts receivable in 1973?

15:24:12

17 A. Yes. And August was the end of our
18 year. That ended.

19 Q. That fiscal year for Chemical
20 Service?

15:24:25

21 A. Yes. And then accounts payable for
22 1973 as of August 31st. That's when we did
23 auditing. Inventory for August 31st, 1973.

24 Q. You just turned the page and you're
25 reading from the top of the left-hand side of

15:24:41

1 the ledger?

2 A. Yes.

3 Q. What does that indicate, the
4 inventory August 31st, 1973?

5 A. It's all the material on hand.

15:24:49

6 Q. What companies had material on hand
7 on August 31st, 1973?

8 A. Sylvania Electric, Thermodisc, BF
9 Goodrich and General Electric.

10 Q. The right-hand side of the ledger
11 is titled inventory August 31st, 1972. What
12 companies had inventory on hand on August 31st,
13 1972?

15:25:02

14 A. General Tire. Paramold
15 Incorporated. Sylvania Emporium. Sylvania,
16 Altoona. That's the city. Olin Plastics.
17 Ohio Graphs. And caustic soda which we
18 purchased.

15:25:17

19 Q. Did you make those entries?

20 A. Yes.

15:25:34

21 Q. Did you make them in the ordinary
22 course of business?

23 A. Yes, I did.

24 Q. The next page of the ledger is
25 entitled again AC/PAY, August 31st, 1972. What

15:25:39

1 does that indicate?

2 A. That's our accounts payable bills
3 we owe as of that date.

4 Q. On the right-hand side of the
5 ledger it indicates inventory August 31st,
6 1971. What companies had inventory on site?

15:25:54

7 A. Bethandale Corporation, Norwalk
8 Thermostat, Sylvania Altoona, General Tire,
9 Luxaire, Olin Plastics, Sylvania and Emporium
10 and empty clean drums.

15:26:19

11 Q. Turning the page again, inventory,
12 August 31st, 1970. And again there's a list
13 there, without reading it, is that a true and
14 accurate list of the companies that had
15 inventory on site at Chemical Services as of
16 August 31st, 1970?

15:26:38

17 A. Yes, it is.

18 Q. Did you make that entry in the
19 ordinary course of business?

20 A. Yes, I did.

15:26:47

21 Q. Does it indicate the cost and the
22 volume of the material on site?

23 A. It has -- yes. It has cost and
24 value on here.

25 Q. Where did you get that information?

15:27:01

1 Who provided you with that information?

2 A. It depends. Bethandale Corporation
3 had chlorethene. And we had three drums on
4 hand and it was their material. And the
5 freight paid here, I don't have a value on 15:27:18
6 that. It was their material. Not ours. This
7 was for our inventory and his cost of the
8 freight.

9 There's three drums of
10 trichlorethylene from Perry Faye. That's a 15:27:33
11 small company in Elyria. And the cost \$8, the
12 value is \$24.

13 Do you want me to go on?

14 Q. If you think there's something that
15 needs interpretation, if you think -- 15:27:51

16 A. The Perry Faye trichlor was
17 something we bought and we put a value on it
18 for inventory.

19 Q. Why don't you just go down the page
20 so we have a good understanding of what you did 15:28:04
21 on that page, August 31st, 1970?

22 A. General Tire was hexane, one drum
23 cost \$8 and value is \$8. Sylvania Electric is
24 synasol, 42 drums, which was their material
25 that was for reclamation. 15:28:28

1 Union Carbide was isopropenyl was
2 5,315 gallons, 12 cents a gallon. The value
3 was \$637.80. The freight was \$209. The milage
4 was 475 miles.

5 MR. McWILLIAMS: Steve, can we go 15:29:03
6 back to the record on the General Tire dated
7 6-19. I think the records reflects in here --

8 THE WITNESS: General Tire, 6-19 to
9 8-1-1970?

10 MR. McWILLIAMS: Correct.

11 THE WITNESS: General Tire hexane
12 on hand was 22,900 gallons, six cents a gallon
13 cost, value \$1,374. The freight was \$118.80.
14 And it was 270 miles at 44 cents a mile.

15 MR. McWILLIAMS: Who was the 15:29:46
16 customer for the one drum of trichlor on the
17 next line?

18 THE WITNESS: The trichlor we
19 purchased.

20 Q. From whom? 15:29:53

21 A. Perry Faye. It's a small company
22 in Elyria. We didn't do very much with them.

23 Excellofab Company,
24 trichloroethylene, one drum, \$8, value \$8.

25 Union Carbide was isopropenyl 5,315 15:30:15

1 gallons, cost 12 cents a gallon, value was
2 \$637.80. Freight was \$209 and it was 475
3 miles.

4 RO Hall is a chloride mix, 36 drums
5 is their material. That was for reclaiming.
6 And Aztec Chemical was empty drums and there
7 were chloride cans. This was all inventory for
8 that period of time.

15:30:42

9 Q. On the right-hand side of the
10 ledger what do we have there?

15:31:02

11 A. This is my accountant's writing.
12 It's his adjusting entries.

13 Q. In fact, in the left margin we see
14 that it's Accountant Supply House, further
15 suggesting it's your accountant's?

15:31:17

16 A. Yes. That was my accountant's
17 work.

18 Q. How about the next sheet?

19 A. This is still.

20 Q. Still the accountant's work?

15:31:23

21 A. Yeah. Chemical Service
22 Incorporated adjusting entries August 31st,
23 1971.

24 Q. How about on the right-hand side of
25 the ledger?

15:31:35

1 A. That's my accountant's.

2 Q. Still the accountant's?

3 A. Yes. And back to us.

4 Q. When you say "us" you mean Chemical
5 Service, Inc.?

15:31:45

6 A. No. This is not mine. This is his
7 too. It's just a different sheet of paper.
8 This is showing depreciation, interest and so
9 forth. And this is August 31st, 1973. The
10 other one was '72. This is '72 here. That's
11 '72.

15:32:02

12 And then there's 1973. My
13 accountant adjusting entries August 31st of
14 '73. And this is the accountant's writing,
15 August 31st, '73. And this is also the
16 accountant. It's not my writing.

15:32:26

17 I'm back to my writing. Cash in
18 the bank.

19 Q. Where it says cash in the bank on
20 the right-hand side of the ledger, that's your
21 entry?

15:32:43

22 A. That's mine.

23 Q. And that begins with a entry on
24 9-30-69?

25 A. Yes.

15:32:51

1 Q. What's on the next page?

2 A. Cash in the bank. Goes through
3 1-31-74.

4 Q. And then accounts receivable, what
5 does that indicate? 15:33:01

6 A. Accounts receivable is money owed
7 to us. It does not give the company, where it
8 came from. And then '69 and '70, and '71 to
9 9-1. And this is '71, 9-30-71 to 9-30-73. And
10 that's a blank. These are all sheets where 15:33:29
11 things have been entered into the journal and
12 these were done by my accountant.

13 Q. And you're indicating a sheet that
14 has at the top of it --

15 A. Insurance logs. 15:33:48

16 Q. -- insurance logs?

17 A. Inventories. These are my
18 accountant's sheets.

19 Q. Leafing through that book do you
20 see anything that identifies Chemical Service,
21 Inc.'s customers? 15:33:55

22 A. Cost of setting up a new business.
23 And '65 started. This is my accountant's work.
24 And that is accumulated depreciation,
25 equipment, purchased, equipment, accumulated 15:34:19

1 depreciation on equipment. This is all done by
2 my accountant, this part.

3 Q. Again, not providing information as
4 to customers --

5 A. No. 15:34:37

6 Q. -- of Chemical Services? All
7 internal --

8 A. This is accumulated depreciation
9 automotive. Office equipment. Accumulated
10 depreciation on office equipment. Deferred 15:34:53
11 interest. These are the accountant's pages.

12 First National Bank was a loan.
13 That doesn't help. First National Bank. It
14 was a note payable, Union Commerce Bank for the
15 boiler that we purchased for Chemical Service. 15:35:23

16 CIT Corporation, stainless steel
17 trailer. This was the purchase of a stainless
18 steel trailer from CIT Corporation. These are
19 my accountant's notes. This is Obitts Chemical
20 Company. Dr. Smith's account. He's the one 15:35:59
21 who helped my husband set up the tower in
22 there.

23 Q. That's not a medical doctor, that's
24 a doctor of --

25 A. No. He's a doctor. 15:36:08

1 Q. -- engineering?

2 A. Chemical engineering. He was a
3 chemist. These are all -- nothing pertaining
4 to customers. My account. My husband's
5 account. Accounts payable. These are done by
6 -- some is my writing and some is my
7 accountant's writing. It's accounts payable.

15:36:30

8 Q. That's an accounts payable with the
9 date of 1966, and the first entry of 5-31-66?

10 A. To '74.

15:36:56

11 Q. With an ending entry of '74. What
12 is that date?

13 A. 8-31-74. Employees FICA.
14 Employees federal income tax, city income tax,
15 city income tax withheld. These have no
16 bearing on what we're trying to talk about.

15:37:19

17 Q. No. I just want to be thorough
18 here. If you see anything that does, as you
19 leaf through it let us know, otherwise we'll
20 finish up that ledger.

15:37:34

21 A. Accrued payroll. Loans. Stock
22 purchase. This is accumulated losses and
23 earnings. That's from my accountant. Profit
24 and loss account. Profit and loss account.
25 These are just totals of accounts receivable

15:38:02

1 and sales and no customers written in here.

2 Q. Again, that's on the left-hand side
3 of the ledger, Chemical Services, Inc., profit
4 and loss account, August 31st, 1973. And on
5 the right-hand side of the ledger AC/REC,
6 period, sales, correct? 15:38:17

7 A. Yes. '69, '70, '71, up through
8 August. And this is a continuation of that
9 gross wages.

10 These are of no interest to this 15:38:33
11 group. Insurance, Workers' Comp, office
12 supplies, caustic soda, drums that we
13 purchased, operational supplies, material,
14 repairs and maintenance, electric, gas,
15 telephone, water bill, truck and auto expense, 15:39:04
16 labor job out, truck rental, dump fees, travel
17 expense, cities expense, rent, rent, outside
18 services.

19 There's employers FICA unemployment
20 compensation, franchise taxes, personal 15:39:38
21 property tax, legal and professional,
22 depreciation, interests, other expenses.
23 That's it.

24 Q. All right. And that concludes the
25 review of the Chemical Services, Inc. general 15:39:57

1 ledger roughly 1971 through '73 marked for
2 purposes of the identification as EPA Exhibit
3 10?

4 A. Yes.

5 MR. KAISER: Thank you. I think I
6 may need a break just to see what I have left
7 and how best to approach it. So if I could ask
8 for a 10 minute break, we'll start up at
9 quarter to four.

10 (Recess had.)

11 MR. KAISER: Mrs. Obitts, we're
12 again resuming your deposition. You've taken a
13 short break. It's now about 10 minutes to
14 four.

15 I'd like to, as a matter of
16 housekeeping, show you a document that I've now
17 marked for purposes of identification as EPA's
18 Exhibit 13. It's titled at the top dirty
19 inventory record. And it's the document that
20 Mrs. Obitts testified about this morning. It
21 contains certain yellow highlighting marks.

22 Q. Mrs. Obitts, I'm showing you what
23 we've marked as USEPA's Exhibit 13, do you
24 recognize that document?

25 A. Yes, I do.

15:40:47

15:56:00

15:56:16

15:56:30

1 Q. Isn't it a fact a document we
2 reviewed this morning?

3 A. Yes.

4 Q. And the yellow marking on that
5 document, who placed that marking on the
6 document?

15:56:36

7 A. I did.

8 Q. When did you do that?

9 A. Yesterday afternoon at my home.

10 Q. And this is the same document that
11 I've now marked as USEPA 13 that you testified
12 from and that refreshed your recollection
13 earlier today?

15:56:43

14 A. Yes.

15 Q. Thank you very much.

15:56:53

16 MR. McWILLIAMS: Is that document
17 the same as Exhibit 6?

18 MR. KAISER: It may well be. The
19 reason I put in 13 in addition to what I
20 believe is Exhibit 6 is because 13 has her
21 markings, and in the Exhibit 6 you would not
22 have those markings.

15:57:11

23 This is the legal size and it
24 contains Mrs. Obitts's yellow markings.

25 MR. MILLICAN: Am I to assume, or I

15:57:42

1 missed it, did we miss 11 and 12?

2 MR. KAISER: We're going to go back
3 to 11 and 12.

4 MR. MILLICAN: Okay.

5 MR. McWILLIAMS: If the record will
6 reflect that we did not get Exhibit 6.

15:57:57

7 MR. KAISER: The record will
8 reflect that no one other than the witness and
9 the court reporter has received a full copy of
10 the exhibit. And most people have not had the
11 benefit of seeing as we've gone along the
12 exhibits that Mrs. Obitts has testified to.

15:58:10

13 So to the extent I say you have it
14 or been given it, I don't mean to suggest that
15 everyone has received a true and accurate set
16 of the exhibits we used today.

15:58:24

17 As we discussed a little bit on the
18 record, and certainly off the record, when we
19 conclude Mrs. Obitts's testimony this
20 afternoon, Mr. Nash and I are going to work the
21 court reporter and ensure that the court
22 reporter leaves here today either with original
23 documents or with copies of the original
24 documents that conform perfectly to the
25 original document that Mrs. Obitts used in her

15:58:36

15:58:51

1 testimony today.

2 MR. McWILLIAMS: Thank you.

3 Q. Now, Mrs. Obitts, again proceeding
4 a little bit out of order in terms of the
5 exhibit numbers. I want to show you what I've 15:59:07
6 marked for purposes of the deposition as EPA
7 Exhibit 14, and it's a series of, it's a one,
8 two, three, four, five, six, seven, eight page
9 set of documents.

10 If you would look those over, Mrs. 15:59:29
11 Obitts, and tell me if you recognize those
12 documents?

13 A. I recognize them. Yes.

14 Q. Now, the first page of this exhibit
15 14 I'm going to mark and refer to as 14A, and 16:00:17
16 it's titled rules and regulations of Obitts
17 Chemical dated 6-30-67?

18 A. Yes.

19 Q. Did you prepare it on or about June
20 30th, 1967? 16:00:31

21 A. Yes.

22 Q. Does it in fact lay out the rules
23 and regulations of Obitts Chemical Company?

24 A. Yes.

25 Q. And the second page, 14B, is that 16:00:38

1 also part of the rules and regulations of the
2 Obitts company?

3 A. Yes.

4 Q. Prepared on or about June 30th,
5 1967?

16:00:48

6 A. Yes.

7 Q. Now this handwritten note that is
8 Exhibit 14C, what is that?

9 A. Mr. L. Obitts was Russ's father.

10 Q. Would you read that into the
11 record?

16:01:07

12 A. Have Mr. L. Obitts write a letter
13 of resignation stating he resigns his office
14 and directorship of Obitts Chemical Company,
15 and date the letter July 1st, 1961.

16:01:21

16 His father was very elderly and he
17 was put into a nursing home and they wanted to
18 release him of the directorship position which
19 he had had with the company.

20 Q. And 14D, the handwritten notes on
21 the following page, does that also pertain to
22 the resignation of your husband's father from
23 Obitts Chemical?

16:01:41

24 A. No. The top part, no. Have him
25 resigned as of July 1st, 1961. Yes. That

16:01:56

1 bottom part refers to that resignation.

2 The top part is a check for \$100 to
3 Vandermark who was an attorney. It was just a
4 note.

5 Q. That's not your handwriting?

16:02:16

6 A. Yes, it is. I scribbled that.

7 Q. And then the next page is a shift
8 schedule for 1967?

9 A. Yes.

10 Q. Do you know who prepared that?

16:02:29

11 A. I did not prepare this. I don't
12 know who did. I didn't do this.

13 Q. Do you know whether that in fact
14 was the shift that was in effect at Obitts
15 Chemicals during 1967?

16:02:45

16 A. I don't really quite understand it,
17 with all these different numbers. I don't know
18 anything about this.

19 Q. All right. That's fine. I don't
20 want to take any --

16:03:06

21 A. I can't say anything because I
22 don't know.

23 Q. That's fine. I won't take any more
24 of your time. If you turn the page then, 14F,
25 rules and regulations, did you prepare that?

16:03:17

1 A. Yes, I did.

2 Q. Is that your signature?

3 A. Yes, it is.

4 Q. I see that some sections are
5 crossed out?

16:03:26

6 A. Yes.

7 Q. And in paragraph 10, Walter Coats
8 was --

9 A. Walter Coats was a still operator.
10 But we made Jim Jackson foreman. And that was
11 why that was crossed out. Jim Jackson was
12 formerly a truck driver. He didn't want to be
13 the foreman, but he took the job.

16:03:37

14 Q. And then the next page, 14G?

15 A. It's the same thing.

16:03:59

16 Q. And then the following page, 14H,
17 again a revision or the rules and regulations
18 with some annotations. Is that a fair
19 description of the document?

20 A. Yes.

16:04:15

21 Q. Then I'd like to turn your
22 attention with certain trepidation to another
23 ledger that's been marked for purposes of
24 identification as EPA's Exhibit 11. If you
25 could take a look at that and tell me if you

16:04:38

1 recognize that?

2 A. Yes, I do recognize it. And I
3 looked at it yesterday too.

4 Q. What do you recognize that to be?

5 A. It is a ledger. It's a cash
6 disburse ledger. This is for Chemical Service
7 Corporation.

16:04:49

8 Q. Chemical Service Corporation. And
9 that's a payout, is it cash disbursement?

10 A. Yes.

16:05:31

11 Q. Is the entire thing cash
12 disbursements?

13 A. As far as I can see.

14 Q. Is there any information in there
15 that you can glean about the identity of
16 customers of Chemical Services?

16:05:41

17 A. The whole ledger is cash disbursed.
18 Not customers. People on payroll. Not really
19 customers.

20 Q. But that is a true and accurate
21 original, that is the original document of the
22 disbursements ledger for that time period?

16:05:58

23 A. Yes, it is.

24 Q. And that's maintained by Chemical
25 Services, Inc.?

16:06:09

1 A. Yes. And I wrote it. It's my
2 handwriting, the whole ledger.

3 Q. And the ledger was maintained in
4 the ordinary course of business?

5 A. Yes, it was.

16:06:16

6 Q. And you relied on that ledger to
7 manage the business and prepare taxes?

8 A. Yes, I did.

9 Q. All right.

10 A. But there are not customers in
11 here.

16:06:29

12 Q. No reference to customers or even
13 people that Chemical Services may have
14 purchased materials from?

15 A. I don't -- no. I doubt it. I
16 don't think so. I don't recall seeing any when
17 I looked through this yesterday.

16:06:41

18 Q. All right. Then that might
19 conclude our review of this ledger.

20 A. It's rather delicate and damaged
21 somewhat.

16:07:02

22 Q. Now, this ledger, you didn't hang
23 on to this ledger? This has not been in your
24 custody for the last 20 years or so, has it?

25 A. No. Yesterday was the first time I

16:07:16

1 saw it since I worked there.

2 Q. And that's a ledger for the time
3 period of 1965 to 1970 for Chemical Services
4 Corp?

5 A. Yes. 16:07:29

6 Q. Now, I'm going to show you a
7 photocopy of another ledger. I do not have the
8 original document with me today. And to be
9 quite honest, I don't know where the original
10 ledger is. 16:07:48

11 But, I'd ask you to look over what
12 I believe is a photocopy of a ledger that
13 begins with, on the first page, August 1965 and
14 contains certain entries. And I'd like you to
15 take some time and see if you recognize whether 16:08:02
16 that's a ledger for Obitts Chemicals or
17 Chemical Recovery Services?

18 MR. MILLICAN: Is there an exhibit
19 number on that, Steve?

20 MR. KAISER: Yes. That's Exhibit 16:08:16
21 12.

22 A. This is Chemical Service
23 Corporation. I can tell from the first page.

24 Dr. Allen Smith wanted a little bit
25 in the company and it's written right here. He 16:08:25

1 contributed \$500 into the company because he
2 wanted a little bit of it.

3 Q. Was he the person who designed the
4 distillation process for Chemical Services?

5 A. Yes.

16:08:40

6 Q. Is he still living?

7 A. No. I sent the \$500 to his wife
8 when he died. She was very glad to get it.
9 Some of these are not -- these are upside-down
10 and the page isn't right here. This has got to
11 have another page here.

16:09:01

12 Yes, that's it. It goes this way.
13 You got your stamp on the wrong side.

14 Q. I'm sorry.

15 A. That's okay. It really goes this
16 way.

16:09:23

17 Q. And now that you have it oriented
18 and you've oriented yourself, can you tell
19 again what type of ledger is this?

20 A. This is a cash disburse ledger,
21 shows payroll and utility bills, monies that
22 was spent by Chemical Service.

16:09:34

23 Q. Is there anything in there as you
24 leaf through it, and again, were those entries
25 made by you?

16:09:49

1 A. Yes. That's my handwriting.

2 Q. And made on or about August 1965?

3 A. Yes.

4 Q. And made in the ordinary course of
5 business?

16:09:58

6 A. Yes.

7 Q. If you just leaf through that and
8 review it. Is there anything that indicates
9 the identity of customers of Chemical Services,
10 Inc. during this 1965 time period?

16:10:09

11 A. A lot of this was I believe
12 starting to rebuild the building that blew up.
13 This is near the end of '65 and the beginning
14 of '66. Building permit. Building materials.

15 Q. So nothing that you're seeing that
16 would help us identify?

16:12:48

17 A. There is one entry here, Firestone,
18 synthetic rubber for 114.57, which is under
19 material.

20 Q. What does that suggest to you?

16:13:02

21 A. It must be something that we
22 purchased, because this is cash disbursed.
23 Nothing under material on these pages.

24 Q. So you're reviewing the material
25 column to see whether there were any purchases

16:14:04

1 and you're not finding any?

2 A. No. I think that we were
3 rebuilding the building and getting it ready to
4 open again. There's a plumber's bill, material
5 bills.

16:14:43

6 There is one entry here. I'm not
7 very clear. October 1966, Technical Products
8 Incorporated 228.33, is under material
9 purchased. But I don't know what it is.

10 Q. Okay. Thank you.

16:15:38

11 A. This doesn't tell what it is.

12 There's another Technical Products
13 Incorporated for 1,278.96 under material.
14 Ashland Oil & Refining \$204. It's under
15 material. But I don't know what it is.

16:16:23

16 Q. What date was that purchase made?

17 A. March 27th, 1967.

18 Q. And at the top of the ledger book
19 it indicates March 1967 and that's on line?

20 A. Line 13.

16:16:41

21 Q. What was the amount of that
22 purchase?

23 A. \$204.

24 Q. Do you have any recollection as to
25 what that might have been for?

16:16:53

1 A. No.

2 Q. I'm sorry. The answer was no?

3 A. No, I don't know. Most of this in
4 the material column is empty. There's a
5 material column right there and nothing in it.

16:17:08

6 Q. Again, all these entries, were
7 these made by you?

8 A. Yes. That's my writing on all of
9 these.

10 Q. On all the pages you've reviewed?

16:17:32

11 A. Yes.

12 Q. Do those appear to be true and
13 accurate copies of ledger books maintained by
14 Chemical Services back in the 1965, '66, '67
15 era?

16:17:44

16 A. Yes. There's an Ashland Oil &
17 Refining, material purchased for \$600 on August
18 2nd, 1967. General Tire & Rubber Company,
19 material purchase for 414.10 on October 2nd,
20 1967. On February 28th, 1968 from General Tire
21 & Rubber \$243.65 under material purchased.

16:18:31

22 Q. And do you have any idea as to what
23 type of material Chemical Recovery Service may
24 have purchased?

25 A. No. But we did find that on some

16:19:36

1 other records. The same company.

2 Q. Same type of entry?

3 A. Yes.

4 Q. Would you have purchased caustic
5 soda from General Tire & Rubber?

16:19:48

6 A. No, not at all. April 15th, 1968
7 material purchased from General Tire & Rubber
8 for \$428.17. September 27th, General Tire &
9 Rubber, 245.74.

10 Q. Again that entry, was that made in
11 your own hand?

16:21:05

12 A. Yes, it was. This is all my
13 handwriting.

14 Q. Everything you've seen as your
15 reviewing this exhibit is consistent with it
16 being a true and accurate copy of a ledger
17 created and maintained by Chemical Service?

16:21:15

18 A. Yes, it is.

19 Q. As you've reviewed the copy have
20 you seen anything where it appears that someone
21 else's hand is in there, or where entries have
22 been altered or removed?

16:21:31

23 A. No. There is not any alterations
24 or removal, no. It's all my handy work.

25 Q. All your handy work. Very good.

16:21:51

1 A. There's a April 14th, 1969 from
2 General Tire & Rubber, 598.08.

3 That would be a caustic soda.

4 Q. Who would you purchase the caustic
5 soda from?

16:23:09

6 A. Industrial Alkali.

7 Q. What date was that purchase made?

8 A. It was under material marked
9 caustic, September 16th purchased Industrial
10 Alkali and Acid Company, which was caustic
11 soda, 164.80.

16:23:30

12 Q. What year was that?

13 A. 1969.

14 There's \$100 entry for Ashland
15 Chemical Company, and that has to be something
16 we purchased from them, on November 6, 1969.

16:24:18

17 Q. Do you know whether that was
18 material you purchased to assist the
19 distillation process?

20 A. Yes. It was to be used in the
21 processing. June 2nd, 1970 from General Tire &
22 Rubber, 437.22.

16:24:37

23 Q. What year?

24 A. 1970.

25 That's it.

16:25:41

1 Q. All right. Thank you. And again
2 nothing that you saw in this photographic
3 reproduction of the ledger suggested that the
4 original document had been tampered with or
5 altered?

16:25:57

6 A. No.

7 Q. And the original document you
8 prepared?

9 A. Yes.

10 Q. In the ordinary course of the
11 business?

16:26:01

12 A. Yes.

13 Q. I'm going to show you what's been
14 marked as EPA Exhibit 15. It's a ledger that
15 begins on page one and at the top it says
16 September 1967. I'd ask you to take a look at
17 that document and tell me if you recognize what
18 it is?

16:26:47

19 A. It's also cash disbursed.

20 Q. For which company?

16:27:00

21 A. For Chemical Service Corporation.

22 Q. In what way is it similar and what
23 way does it differ from the ledger you just
24 reviewed?

25 A. This is September of 1967. It has

16:27:15

1 payroll.

2 Q. So that wouldn't be of any --

3 A. And it has bills.

4 Q. -- relevance to this group.

5 Does it indicate any customers or
6 any material purchases?

16:27:29

7 A. It might.

8 Q. Do you want to take a look if you
9 have the patience.

10 MR. McWILLIAMS: First of all, I'd
11 like to request that copies be made available
12 of all documents that you showed the witness
13 yesterday. I think we're entitled to see any
14 of those documents, especially if she
15 highlighted them.

16:27:50

16:28:06

16 And, secondly, to the extent that
17 copying is not possible by tomorrow, can you at
18 least make them available to us for review
19 tomorrow?

20 MR. KAISER: Yes. Let's take a
21 minute while we're off the record. Let's go
22 off the record.

16:28:20

23 (Discussion off the record.)

24 MR. KAISER: We've had a brief
25 break where we've talked off the record and

16:33:48

1 we've agreed that we're going to conclude this
2 portion of your deposition, Mrs. Obitts. We
3 ask you to return tomorrow shortly before 10:00
4 so that we can resume your testimony at 10:00
5 a.m. You're of course free to go.

16:34:04

6 We want to thank you for your
7 effort and patience here today and we look
8 forward to seeing you again tomorrow. With
9 that we adjourn today's proceedings.

10 (Deposition adjourned.)

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1 CERTIFICATE

2 The State of Ohio,)

3 SS:

4 County of Cuyahoga.)

5
6 I, Claudine Kelly, a Notary Public
7 within and for the State of Ohio, duly
8 commissioned and qualified, do hereby certify
9 that the within named witness, DOROTHY OBITTS,
10 was by me first duly sworn to testify the
11 truth, the whole truth and nothing but the
12 truth in the cause aforesaid; that the
13 testimony then given by the above-referenced
14 witness was by me reduced to stenotypy in the
15 presence of said witness; afterwards
16 transcribed, and that the foregoing is a true
17 and correct transcription of the testimony so
18 given by the above-referenced witness.

19 I do further certify that this
20 deposition was taken at the time and place in
21 the foregoing caption specified .
22
23
24
25

1 I do further certify that I am not a
2 relative, counsel or attorney for either party,
3 or otherwise interested in the event of this
4 action.

5 IN WITNESS WHEREOF, I have hereunto
6 set my hand and affixed my seal of office at
7 Cleveland, Ohio, on this 17th day of
8 December, 2004.

9
10
11
12
13 Claudine Kelly

14 Claudine Kelly, Notary Public

15 within and for the State of Ohio

16
17 My commission expires December 25, 2007.
18
19
20
21
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24
25

SIGNATURE OF WITNESS

The deposition of DOROTHY OBITTS,
taken in the matter, on the date, and at the
time and place set out on the title page
hereof.

It was requested that the
deposition be taken by the reporter and that
same be reduced to typewritten form.

It was agreed by and between
counsel and the parties that the Deponent will
read and sign the transcript of said
deposition.

AFFIDAVIT

The State of Ohio,)

) SS:

County of Cuyahoga)

Before me, a Notary Public in and for
said County and State, personally appeared
DOROTHY OBITTS, who acknowledged that he/she
did read his/her transcript in the
above-captioned matter, listed any necessary
corrections on the accompanying errata sheet,
and did sign the foregoing sworn statement and
that the same is his/her free act and deed.

In the TESTIMONY WHEREOF, I have hereunto
affixed my name and official seal at this _____
day of _____ A.D 2004.

Notary Public

My Commission Expires:

DEPOSITION ERRATA SHEET

RE: CHEMICAL RECOVERY SYSTEMS, INC.

RRS File No.: 11214

Deponent: DOROTHY OBITTS

Deposition Date: DECEMBER 17, 2004

To the Reporter:

I have read the entire transcript of my
Deposition taken in the captioned matter or the
same has been read to me. I request that the
following changes be entered upon the record
for the reasons indicated. I have signed my
name to the Errata Sheet and the appropriate
Certificate and authorize you to attach both to
the original transcript.

DOROTHY OBITTS

1 **Date: DECEMBER 17, 2004** **RRS File No.: 11214**

2 **To: STEVEN P. KAISER, ESQ.**

3
4 **In Re:**

5 **Deposition of: DOROTHY OBITTS**

6
7 **_____ Counsel of Record - Transcript Enclosed:**

8 Signature of the Deponent is required.
9 Please have the deponent make any
10 corrections/changes necessary on the
11 Errata Sheet ONLY, sign name on the form
12 where indicated and sign the Certificate
13 before a Notary. Please return ONLY the
14 original executed, notarized Certificate
15 and completed, signed Errata to our
16 offices within ___ 7 days ___ 30 days
17 from the date of this memorandum.

18
19 **X Counsel of Record - No Copy Ordered:**

20 Signature of the Deponent is required
21 within ___ 7 days X 30 days from the date
22 of this memorandum. Since you did not
23 request a copy of the transcript from the
24 deposition, it will be necessary for you
25 to call our offices to arrange for an
 appointment for the Deponent to come in
 to read and sign the transcript of the
 Deposition.

19 cc: JAMES T. MILLICAN, ESQ.

20 RICHARD D. PANZA, ESQ.

21 DAVID B. GRAHAM, ESQ.

22 DOUGLAS A. McWILLIAMS, ESQ.

23 JEFFREY C. MILLER, ESQ.

24 KEELY O'BRYAN, ESQ.

25 JOHN A. HEER, ESQ.

DEPOSITION ERRATA SHEET

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SIGNATURE: _____ DATE: _____

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